

# IDEM Midterm Assessment

IDEM's midterm assessment consists of IDEM's pre-midterm adjustment agency and office priorities with status updates. The introductory and closing portions of the EnPPA were not included in this assessment for brevity and remain unaltered. IDEM's final update will contain the post-midterm adjustment version of the EnPPA, complete with status updates.

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# Indiana's Priorities

## 1. IDEM Agency-Wide Priorities

Within IDEM's Strategic Goals and Objectives goals, we have identified five agency-wide priorities on which IDEM will focus during the next two years. These priorities are:

### **Maintain Essential Environmental Services**

- Agency-Wide Permit Team
- Enhance the Rulemaking Process
- Internet Public Notice Standardization
- Enhance IDEM's Compliance/Enforcement Team

### **Coalition Building**

- Build upon Information Infrastructure
- Focus on Concentrated Animal Feeding Operations
- Explain New Attainment/Nonattainment Designations
- Reduce Environmental Asthma Triggers
- Address Multi-State/Multi-Agency Environmental Issues
- Environmental Education
- Partner with Universities on Research and Technical Issues
- Expand Environmental Education Communication with Legislators and Indiana Businesses
- Heighten Agency Profile throughout Indiana

### **Prioritize Services and Programs**

- Prioritize Office of Air Quality Services and Programs
- Prioritize Office of Land Quality Services and Programs
- Focus Internal Resources to Address Most Significant Water Quality Issues
- Prioritize Office of Pollution Prevention & Technical Assistance Services and Programs

### **Reducing Key Environmental Threats**

- Address Issues of Homeland Security
- Address the Need to Reduce Other Environmental Risks
- Address Mercury Issues
- Toxics Assessment Project at School 21 in Indianapolis
- Address Children's Environmental Health, Including Asthma Triggers
- Integrated Pest Management
- Enhance Diesel Emissions Reduction Efforts
- Focus on Potential Environmental Threats in Indiana's Schools

- Environmental Justice

**Building a Better IDEM**

- Enhance Efficiency by Leveraging Peoplesoft© Financial Management System
- Centralized Web Development
- Improve Management of Environmental Data
- Agency Data Integration/Data Management Team
- Establish Indiana Facility Registry System (I-FRS)
- Geography Network
- Document Management System (DMS)
- Focus on Records management Issues to Include Record Retention Schedules
- Workforce Development



### 1.1. Maintain Essential Environmental Services and Deliver Services in as an Efficient Manner as Practical.

Opportunities exist through changes both to processes and procedures and to organizational structure to maintain or enhance some of our critical environmental services. IDEM will focus attention on achieving efficiencies (and therefore using fewer resources) in the following areas:

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#### Leads

Jim Mahern, Bruce Palin, and Office of Investigations Director (Vacant)

#### 1.1.1. Agency-wide Permit Team

Lead Office:  
OPPP/OPA

Enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Establish IDEM Permit Team, comprised of key permit managers and support managers to steer process, administrative and program improvements and efficiencies.

By:

10/1/03 - Establish Team

12/1/03 - Establish Team Workplan

1/20/04 - Implement Workplan

Percent Complete  
50%

Status:

Group has been assembled and monthly meetings are held. Preliminary workplan developed in the form of a continuously updated topical listing.

#### 1.1.2. Enhance efforts to improve and streamline the rulemaking process.

#### 1.1.3. Improve Rulemaking Process

Lead Office:  
OPPP/OLC

Evaluate administrative, rule writing, publication, programmatic and external aspects of rulemaking and make recommendations for revisions to current organization and management of rulemaking.

## Complete evaluation

By: 10/1/03

Percent Complete  
90% complete

## Status:

Evaluation is complete. Formulation of recommendation on suggested changes was pending until the Environmental Quality Service Council (EQSC) completed discussions on rulemaking. EQSC recommendations were to not amend agency rulemaking statutes and allow agency to implement recommended changes to rulemaking process and board interaction. Internal evaluation of rulemaking process continues with recommendations for internal process changes anticipated by spring of 04.

Participate in EQSC Discussions related to rulemaking. Implement recommendations approved by Commissioner.

By: 12/1/03

Percent Complete  
100%

## Status:

The Environmental Quality Service Council (EQSC) has concluded discussion of this issue with recommendation that no further legislative action is necessary at this time.

**1.1.3.1. Rulemaking Activities**

Adjust rules review services and interface with programs on rulemaking activities as necessary, based on legislative or managerial review of rulemaking process changes, duties and functions of agency.

By: 1/31/04

Percent Complete  
85%

## Status:

No anticipated process changes in next legislative session. Those required from '03 session have been implemented. Internal review of process changes to rulemaking continues.

Develop process manual for all rulemaking boards, in cooperation with board members and board counsels.

By: 1/31/04

Percent Complete  
75%

## Status:

First draft complete; final draft in progress.

Revise rulemaking templates used by program rule writers for publication of rules in Indiana Register and preparation of board packets. (Revisions would reflect evolution of the information required to be provided in the documents.)

By: 6/30/04

Percent Complete  
90%

## Status:

Templates have been updated, as have board packets. Reviewing to determine if additional process changes are necessary. Additional changes will depend upon process changes made throughout agency.

Develop coordination program to inform other attorneys with Office of Legal Counsel of pending rulemaking actions.

By: 1/31/04

Percent Complete  
75%

## Status:

Cross-function media meetings taking place for work related to water rules. Developing rules information in conjunction with new rules web page. New rules web page is complete and running. The site includes all ongoing rulemakings and information related to workgroups.

**1.1.4. Internet public notice standardization**

Lead Office: OPA

Work with the program areas to improve and standardize methods of posting permitting decisions for public notice on the Internet.

Through: 6/30/05

Percent Complete  
5%

## Status:

This topic is being addressed by MACS and the Permit Team. MACS will be assembling a workgroup to evaluate.

Assemble a workgroup to evaluate, improve, and standardize the way public notice information for permits is posted to the Web.

By: 4/30/04

Percent Complete  
0%

## Status:

Not started. MACS will be assembling workgroup.

Investigate possibility of establishing a centralized/cross-program public notice website for the agency. Evaluate options and compile recommendations for next steps.

By: 9/30/04

Percent Complete  
0%

## Status:

Not started

Coordinate and implement plans devised by the workgroup.

Percent Complete  
0%

Status:  
Not started

Develop standard operating procedures (SOPs) for standardized processes developed and train affected employees and document training with HR and respective program office employee files.

By: 7/31/05 (Dependent upon decisions made by the workgroup)

Percent Complete  
0%

Status:  
Not started.

#### 1.1.5. Enhance IDEM's Compliance/Enforcement Team

The Compliance/Enforcement Team provides the base for true multi-media initiatives. These initiatives will include periodic cross media educational opportunities and open forums designed to enable staff to identify cross media concerns and provide coordinated approaches to regulated community compliance assistance and enforcement actions. The Compliance/Enforcement Team will enhance IDEM staff's ability to identify and pursue appropriate compliance and enforcement actions through the establishment of model referrals, better coordination with IDEM's regional offices, compliance documentation and enforcement case management training, as well as information and evidence collection training.

Continue work of agency-wide Compliance Enforcement Team to meet/communicate regularly to evaluate information and formulate agency-wide compliance and enforcement strategies and resource allocation.

By: 6/30/05

Percent Complete  
50%

Status:  
The C/E team continues to meet at least 1-2 times per month. Requests for future topics were discussed and will be added to agendas. The Team recently developed a list of closing facilities which will be updated, distributed, and discussed at the 1<sup>st</sup> meeting of each month.

#### 1.1.6. Continue Compliance/Enforcement Planning

Lead Office:  
OE

a) Continue multi-media compliance and enforcement planning and coordination in accordance with current operating procedures (COP) developed by the Compliance Enforcement Team during 2000-2001. Utilize Compliance/Enforcement Planning COP and periodically revise (as needed).

Ongoing



Percent Complete  
50%

Status:

Multi-media compliance and enforcement planning continues, and we revisit the issues every few months. Concerns regarding EPA - lead multi-media inspections were discussed. Quarterly update of the Facilities of Concern list was completed. Communication on closing facilities was discussed and a workgroup was formed. Pollution Complaint Clearinghouse tracking is being revisited. Briefing done on auto salvage initiative. Planning COP has been reviewed and is to be revised based on the review.

- b) Each compliance branch will work with the NWRO to come up with focused inspection and compliance goals for each of the steel mills.

Ongoing

Percent Complete  
0%

Status:

The NWRO and OPA are working to get the project moving again.

- c) Determine if and how multi-media steel mill meetings will occur. If it is decided that the meetings will be held, program offices will meet to discuss a format and content for the meetings with the steel mills.

By: 6/30/04

Percent Complete  
0%

Status:

The NWRO and OPA are working to get the project moving again.

- d) Continue development and implementation of steel mill Compliance Action Plan.

By: 6/30/04

Percent Complete  
0%

Status:

The NWRO and OPA are working to get the project moving again.

- e) Continue development and implementation of foundry sector Compliance Action Plan.

Ongoing

Percent Complete  
50%

Status:

Group working on this met once and will continue to meet each quarter. Second meeting held 1-12-04. Industrial waste conducted workshops and training. Industrial waste inspections have begun. OAQ completed 53% of inspections at major foundries. OPPTA and OLO working with INCMA to promote foundry sand reuse. Met 7/14/04 to discuss progress made during last quarter of fiscal year.

- f) Each office will work with the NWRO to come up with goals and objectives for each of the Indiana steel mills.

By: 6/30/04 and 6/30/05

Percent Complete  
0%

Status:  
The NWRO and OPA are working to get the project moving again.

#### 1.1.6.1. Improve Inspection and Enforcement Procedures

Lead Office:  
OE

Develop a model referral and referral checklist to help generate a complete and high quality referral.

By: 6/30/04

Percent Complete  
100%

Status:  
The project was completed in June 2004.

Review and evaluate the inspection process after implementing the February 4/03 COP for Conducting Single-Media Inspections.

By: 6/30/04

Percent Complete  
80%

Status:  
Reviewed and revised multi-media checklist and verification of inspection form. Discussed additions to the MM Screening Exceptions list and re-sent list for review. Currently reviewing Violation Letter/Summary process. SOP for digital photos is finalized and ready for implementation. MM Screening COP reviewed and will be revised. Planning will begin for MM Training. VL/Summary Letter revised, Referral to Enforcement letter developed.

#### 1.1.6.2. Compliance and Enforcement Sampling Operations Plan

Lead Office:  
OI

"Compliance and Enforcement Sampling Operations Plan" to enhance compliance sampling and monitoring as well as establish an on-call sampling operations team to respond to environmental emergencies.

By: 10/1/03 - final draft plan

3/31/04 - Agency-Wide Distribution and Implementation Training Complete

12/1/03 - First Trial Run Complete

Percent Complete  
90%

Status:  
CE Team COP providing guidance on the development of section specific COP is complete. Section specific COPs are also complete and final, exception of the water section, which is still in the review stages.

#### 1.1.6.3. Enforcement Case Development Training Program

Lead Office:  
OI

Enhance IDEM regulatory and enforcement staff knowledge of their role and responsibilities with respect to environmental enforcement.

Training Material Prepared and Presenters Identified.

By: 9/1/04 - IGCN Training complete  
10/1/04 - NWRO/NRO Training complete  
11/1/04 - SWRO Training complete

Percent Complete  
0%

Status:  
No activity this quarter.

#### 1.1.6.4. Agency-Wide Progressive Enforcement Plan

Lead Office:  
OI

“Agency-Wide Progressive Enforcement Plan” to promote fairness and consistency in IDEM enforcement methodology while reducing duplication of effort in the following ways:

1) Enhanced referral and notification between the Office of Enforcement and Office of Investigations; and 2) Increasing program staff ability to identify proper referral type.

Develop plan for identifying proper enforcement response based upon violation history, culpability and/or significance of harm.

By: 7/1/04

Percent Complete  
95%

Status:  
Office of Investigations Case Selection Guidance was prepared as a counterpart to OE’s Enforcement Referral Policy. This guidance will serve to enhance the ability of program staff to identify proper enforcement type and will serve as a starting point for coordination between OE and the Office of Investigations. The selection guidance is under review at this time. Awaiting upper-level review.

OI Director and OE Section Chiefs meet quarterly to review plan effectiveness and revise as necessary.

Ongoing

Percent Complete  
50%

Status:  
Acting Director meets regularly with OE Section Chiefs

Conduct review of referrals made to both OE and OI to identify those that should have been referred to the other.

By: 8/1/04

Percent Complete  
50%

Status:  
First monthly meeting scheduled for August 2004.

Utilize review findings as basis for section/branch/program specific enforcement referral training/education.

By: 12/31/04

Percent Complete  
0%

Status:  
No activity this quarter.

#### **1.1.6.5. Enhance and coordinate IDEM's assistance to small-regulated entities through the Compliance and Enforcement Team.**

Lead Office:  
OPPTA

The compliance/enforcement team provides a centralized mechanism for a coordinated effort to define, implement and allocate assistance resources (i.e. financial, compliance, technical, regulatory development and regulatory outreach) for small business and other small regulated entities. The Compliance and Enforcement Team's attention to these various media efforts will lead to a more efficient use of existing resources in implementing priority assistance efforts.

#### **1.1.6.6. Coordinate C/E and Compliance and Technical Assistance Program (CTAP) Programs**

Lead Office:  
OPPTA

Develop mechanism through C/E Team to advise Compliance and Technical Assistance Program (CTAP) program on areas of regulatory compliance that are consistently not adhered to and/or areas of upcoming regulations that will impact small businesses.

By: 9/1/03

Percent Complete  
100%

Status:  
Compliance and Technical Assistance Program (CTAP) staff reviewed the Office of Enforcement biweekly reports. An Excel spreadsheet was developed for each of the media that listed the violations of companies back to January 1, 2003. Each spreadsheet has been sorted to show the Top 10 violations in each of the different program areas. The spreadsheets were shared with the program areas during the June 14, 2004 Compliance Enforcement (C/E) Team meeting. C/E Team members were asked to provide CTAP with a list of potential outreach opportunities for both areas of current non-compliance and future environmental rulemakings.

Utilize Compliance and Technical Assistance Program (CTAP) resources in developing compliance assistance tools and providing outreach on new regulations or problem areas for small businesses.

By: 7/1/05

Percent Complete

50%

Status:

See above.

Develop referral process to Compliance and Technical Assistance Program (CTAP) for small businesses recently inspected with findings of deficiencies that Compliance and Technical Assistance Program (CTAP) staff can assist with coming back into compliance.

By: 7/1/05

Percent Complete

50%

Status:

See update provided in 2 sections above..

#### 1.1.7. Stormwater Enforcement Strategy

Lead Office:  
OWQ

Develop a strategy for enforcing stormwater phase II requirements.

By: 9/30/04

Percent Complete

75%

Status:

Permits and Compliance branch staff have formulated an enforcement referral approach that is consistent with the ERP for phase II MS4 communities. This approach is now being implemented. Notification letters for Rule 13, Part A have been sent to entities. Deficiency letters for Rule 13, Part B submittals have been sent to entities. For Rule 6, a notification letter template has been developed. Violation letter templates have been developed as well. A strategy has been formulated for follow-up/inspection of MS4 communities that have requested waivers from the rule as well as for Rule 6 No Exposure Exclusions. The next step is to develop targets for compliance inspections for Rule 13

#### 1.1.8. Toxic Release Inventory

Lead Office:  
OPPTA

with the TRI-ME software. Research current number of hard copy reports submitted.

By: 12/31/03

Percent Complete

100%

**Status:**

Complete: 160 facilities were identified for submitting hard copy 2002 Toxic Release Inventory reports. Of those, 74 used an electronic method of completing the form, but did not submit the form electronically. They were called and asked to submit the electronic versions of their forms. All but 14 complied and submitted their electronic reports.

The remaining 86 facilities completed hard copies by hand. These facilities were contacted through a survey and asked if they were interested in participating in a workshop on how to use the TRI-ME software. There was very little interest to participate, therefore no workshop was held.

A Toxic Release Inventory (TRI) listserv has been set up to provide monthly contact with reporters on tips for accurate reporting and using electronic software to submit reports.

**Implement plan**

By: 1/31/04

**Percent Complete**

100%

**Status:**

74 facilities were individually contacted and asked to resubmit their 2002 Toxic Release Inventory (TRI) forms electronically. We had an 81% response rate. The Indiana Department of Environmental Management was required to hand enter all the hard copies in which a facility did not respond. Further outreach is planned as described above.

A Toxic Release Inventory (TRI) workshop survey was taken asking about the type of workshops reporters would be interested in attending, locations, times of year, etc. The survey had a 13% response rate. Based on these results, 2 classroom style TRI workshops were held in April where attendees were given a TRI reporting refresher and encouraged to submit reports electronically. Workshop info was mailed to over 1000 TRI reporters. Workshop information is available on the web at: [www.in.gov/idem/oppta/tri/workshops.html](http://www.in.gov/idem/oppta/tri/workshops.html).

In addition to the TRI Listserv, Office of Pollution Prevention and Technical Assistance (OPPTA) has begun developing and distributing a TRI newsletter. The newsletter will stress the importance of reporting electronically. It is available on the web at: [www.in.gov/idem/oppta/tri/newsletter/](http://www.in.gov/idem/oppta/tri/newsletter/).

**Measure effectiveness.**

By: 7/1/05

**Percent Complete**

50%

**Status:**

Indiana Department of Environmental Management (IDEM) is currently in the process of receiving approximately 4,000 Form Rs throughout June and July for 2003 data. In August, IDEM will evaluate the number of hard copies and begin contacting the facilities to resubmit electronically. Over 300 facilities submitted hard copy versions of their Toxic Release Inventory (TRI) forms for reporting year 2001. For reporting year 2002, this number decreased by half, approximately 150 facilities submitted hard copies. Of that 150, Office of Pollution Prevention and Technical Assistance (OPPTA) contacted 74 facilities that had completed the forms electronically but did not submit an electronic version. Over 62 facilities that were contacted provided the electronic versions of their reports. Therefore, for reporting year 2002, approximately 85 to 90 facilities submitted hard copies. This is a decrease of about 70%.

## 1.2. Coalition Building

To build on its mission to improve the quality of Indiana's air, land and water, IDEM will strategically reach out to Hoosiers through local communities, universities, business, agri-business, and other state agencies throughout the state. These efforts will include improvements to internal and external communications to help constituent groups understand, meet and even exceed the environmental rules and regulations that affect them.

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### Leads

OCR Director (Vacant), Dave Russell,  
and Terry Coleman

IDEM will address this issue by:

### 1.2.1. Building upon information infrastructure

#### 1.2.1.1. Pursue federal funding to provide bi-lingual documents and/or interpreters to Latino and Hispanic Hoosiers

Lead Office:  
OCR

A growing number of Indiana residents speak Spanish as a first language and have difficulty understanding important environmental information. IDEM will seek federal grant funding to provide Spanish translation services for these Hoosiers.

Through 6/30/05

Percent Complete  
75%

#### Status:

New information has been obtained in regards to phone translation services. A \$100 contract has been approved to partner with a local firm to provide these services and to further determine the need for this service. This duty has been reassigned to the Assistant Commissioner for Public Policy and Planning.

#### 1.2.1.2. Establish an on-line publication catalog/on-line IDEM "bookstore."

Lead Office:  
MACS

IDEM has myriad brochures, reports, other informational documents and products of interest to the public, but does not provide convenient, electronic access to that information.

To increase public awareness of these materials and to heighten awareness of IDEM's services and responsibilities, the agency will:

Create an on-line publication catalog/archive that will allow external and internal customers access to all agency publications.

By: 1/1/04

Percent Complete  
75%



**Status:**

The database system has been created and testing is underway. The Web side interface should be complete by July 2004. The project is now in the Access Indiana work queue.

Explore creation and marketing of an on-line IDEM “bookstore” providing publications and promotional materials.

By: 12/1/03

**Percent Complete**

50%

**Status:**

Initial research on how to create the appropriate purchasing mechanisms is almost complete. Roadblocks have been identified and will need to be resolved with the IDEM Office of Management and Budget and the Department of Administration. Key items to include on the site have been identified.

Explore grant sources to provide information kiosks and displays, outreach campaigns for key issues in environmental justice areas, and electronic notification systems.

By: Information services -- Pursuit of funding will be ongoing. Implementation will begin when funding is obtained.

**Percent Complete**

50%

**Status:**

Initial research has been conducted, but information is limited. Awaiting funding to be finalized via U.S. EPA for Beach Act project. Other projects will be dependent on funding, as well.

### **1.2.1.3. Focusing on Concentrated Animal Feeding Operations (CAFOs) / Expand Communication and Marketing Efforts**

Lead Office: OAR

EPA Role: Federal Guidance Standards, oversight and review.

Help Confined Animal Feeding Operations comply with new regulations

The USEPA has adopted new CAFO regulations, which IDEM will enforce via a new National Pollutant Discharge Elimination System (NPDES) general permit rule.

To help Indiana producers understand and comply with the new regulations, IDEM will expand communication and marketing efforts to agricultural sector by:

Increased communication with agriculture and mainstream media through educational materials, fact sheets that will be used to reinforce agency's message regarding proper agricultural operations and to explain IDEM's rules and regulations.

Increased direct communication among agricultural community, IDEM, and Office of the Commissioner of Agriculture.

Providing environmentally friendly Nutrient Management Education materials to livestock producers.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

A notebook detailing Nutrient Management Planning for the new CAFO/NPDES rule was provided to livestock producers who attended a CAFO/NPDES Video Conference.

Have held one ag media roundtable on CAFO NPDES permit issue; will hold more on upcoming issues. Have established contact list and rapport with Indiana ag media and mainstream media with agricultural interests. Established forum for monthly news column in two agricultural publications.

In addition to developing a News Release promoting the CAFO/NPDES Video Conference, a notebook containing Power Point presentations, the new CAFO/NPDES rule and the copies of the necessary records was developed. Notebooks were given to livestock producers attending the CAFO/NPDES video conference.

Partnered with the Indiana FFA to establish the first ever Environmental Management/Natural Resources Proficiency Award. The award was presented at the State FFA Convention.

Established the first ever Ag Liaison presence at the Indiana State Fair

Established the first ever Ag Liaison presence at the Midwest Pork Conference.

#### 1.2.1.4. Explaining new attainment/nonattainment designations

Lead Office: OAQ

EPA Role: Provide guidance on designation and implementation issues.

#### Explain new designations

New federal attainment/nonattainment designations are being developed throughout the nation to comply with federal law. These new designations will likely require some Indiana communities to take remedial action.

#### To help explain these new designations and potential actions, IDEM will:

Conduct public meetings, provide materials, and seek input to educate the public about the changes.

Ongoing

Percent Complete  
65%

Status:

Outreach on 8-hour ozone is near completion, and will be reinitiated upon federal action. The first phase of PM2.5 outreach is completed. Staff continue to provide presentations and materials to interested groups state-wide as requested.

Submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA

By:

Fine particle designations - 12/31/03 or other date established by USEPA  
Ozone recommendations - 7/15/03

Percent Complete  
100% - Ozone

100% - Fine Particles

Status:

Ozone - 100% - The July 15, 2003 recommendations were supplemented with results of 2003 ozone season data on October 7, 2003. Further information is being prepared for submittal to US EPA on February 6, 2004.

Fine Particles - 100% - We submitted recommendations to US EPA on February 15, 2004.

#### 1.2.1.5. Reducing environmental asthma triggers

Lead Office:  
OPA/OAQ

EPA Role: Grant funding. Advisor to the Environmental Quality Workgroup.

#### Work with Indiana Joint Asthma Coalition (InJAC) to reduce asthma effects on children

IDEM will work with its co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees. IDEM will:

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems.

By: 10/31/03

Percent Complete  
100%

Status:

Initial surveillance report was made to InJAC on March 11, 2004. TRI and air data were included.

By: 2/29/04

Percent Complete  
85%

Status:

OPA staff continue to work with Indiana State Department of Health (ISDH) staff on leading the Indiana Joint Asthma Commission (InJAC) as well as two subcommittees - Environment and Children and Youth. The overall InJAC plan will be developed on time, with the help of ISDH and several contractors. The Environmental and Children and Youth Group have both finalized their respective goals and objectives and strategies, definitions and rationale background information. The contractor will edit the state plan, which is due September 2004.

Work with the Environmental Quality committee to access information and evaluate the environment in Indiana, using available information, to develop recommendations to identify known and potential indoor/outdoor environmental triggers for asthma, and to identify strategies and develop tools for organizations to reduce exposures to asthma triggers

Lead: Paula Smith, Cheri Storms (OPA)

By: 6/30/05

Percent Complete

65%

## Status:

The Environmental Quality committee has drafted a number of issue briefs, which will support their recommendations. The Environmental Quality Committee has also developed a "triggers" table, which will reference triggers listed in the Committee's final recommendations, and will also support the web-based tool. The table needs to go out for comment one more time. IDEM staff drafted a web-based tool, and received approval from both the Environmental Quality and Children and Youth committees to move forward. IDEM has a contractor (through the Indiana Environmental Health Association) that is assisting in the development of its web-based tool and related triggers. The IDEM design team is in the process of designing the Astherville and graphics that will be included in the tool. The content of information has been developed for the school, childcare, parents, housing (homeowners, rental, and tenants), medical providers and outdoor settings. After the design team has developed a full set, it will go out for comment to Environmental Quality group and other members of InJAC.

The Environmental Quality Committee has met with the four sub-committees to discuss how to work together, avoid duplication of efforts, etc.

Establish a comprehensive plan to reduce the burden of asthma in four sets of age groups of children: reduce encumbrance of asthma for children; and develop a comprehensive asthma surveillance system for each of the four age groups.

By: 6/30/05

Percent Complete

85%

## Status:

The Children and Youth INJAC Workgroup meet monthly. The group is working to develop its goals, objectives and strategies for the State Asthma Plan. The Children and Youth Group has finalized goals and objectives and strategies, definitions and rationale for the GOS. The group has also prioritized the objectives and strategies. The contractors will be editing for the Sept 2004 deadline. Then, the plan will go to commissioners of IDEM/ISDH for their comments.

Develop educational material regarding environmental triggers of asthma and distribute to childcare facilities and other interested parties.

By: 6/30/05

Percent Complete

50%

## Status:

IDEM has received EPA funding and hired a contractor from the Environmental Health Association. IDEM staff and contractor have been working on the content of the tool by setting up focus groups. To date, the school, childcare, medical, housing and parent focus groups have met. The outdoor environment focus group needs to meet. The content of the information is completed in draft form. But, will need to go out for comment to the Environmental Quality and other members of Indiana Joint Asthma Coalition (InJAC). The design team is working on the house and school part of the town.

**1.2.2. Addressing multi-state/multi-agency environmental issues**

Lead Office: OI

**1.2.2.1. Build on cross jurisdictional enforcement**

IDEM has worked for many years to forge relationships with the Environmental Crimes Task Force (ECTF), EPA Criminal Investigation Division (CID), Indiana Department of Natural Resources (IDNR), US Department of Transportation (DOT), local prosecutors and various other federal, state and local offices and agencies, as well as with the Midwest Environmental Enforcement Association, to effectively address multi-state/multi-agency environmental issues.

**IDEM will enhance its cooperative work with outside organizations to:**

Provide cost-effective training for IDEM regulatory staff, attorneys, investigators and county prosecutors through the Midwest Environmental Enforcement Association.

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

Four Indiana representatives attended the Basic Criminal Environmental Investigator's Course (BCEIT). Two Indiana representatives provided a block of instruction for the BCEIT course. Through MEEA, one IDEM attorney will be attending Advanced Environmental Crimes Seminar for attorneys, which is being presented by the US Department of Justice.

Continue to actively participate in Environmental Crimes Task Force (ECTF), Indiana Department of Natural Resources (IDNR) and EPA Criminal Investigation Division (CID) meetings.

Ongoing through 6/30/05

Percent Complete  
100%

**Status:**

Attendance and participation in all scheduled task force meetings has been accomplished.

Review all complaints and referrals received for potential involvement of other agencies

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

Ongoing case-by-case review and discussion with other agency heads.

**1.2.2.2. Environmental Education**

**1.2.2.2.1. Build on environmental education efforts**

EPA Role: Funding, guidance

**1.2.3. Lead Office: OPA**

IDEM will continue to build on its efforts to educate citizens about environmental issues and ways to become involved in environmental protection.

**The agency will accomplish this by:**

Expanding IDEM's education and outreach efforts by encouraging environmental experts, including staff chemists, geologists, and other scientists to make school presentations as partners with OPA's Education Team.

By: 6/30/05

Percent Complete

50%

Status:

IDEM staff were consulted for expertise in various areas and utilized where applicable to make presentations.

Coordinating IDEM school presentation resources and materials, including Earth Week presentation kits and IDEM exploration books.

By: 6/30/05

Percent Complete

50%

Status:

New resources were added to the environmental education web site. New materials were gathered for use in various presentations.

Assisting in outreach events, such as, Earth Day Indiana, the Hoosier Association of Science Teachers (HASTI) convention, the Indiana Youth environmental Summit (IYES), the Indiana State Fair, and Indiana Recycling Coalition (IRC) education sessions.

Ongoing

Percent Complete

50%

Status:

Events completed include in the last quarter include: Girl Scout Troop Leader training workshop, Martin Luther King Jr. Service Day, 3 school visits, Indianapolis Association for the Education of Young Children Conference Teacher Workshop, Hoosier Association of Science Teachers Workshop, America Recycles Day Business Workshop, and the Statewide Association for the Education of Young Children Conference Teacher Workshop.

Developing and distributing information regarding mercury, asthma, and child care facility programs to children, parents, and educators.

Ongoing

Percent Complete

50%

Status:  
These materials continue to be distributed at the respective events mentioned above.

Distributing home self-assessment booklet and IDEM supplement for potentially harmful items found in the home to citizens and schools.

By: 6/30/05

Percent Complete  
50%  
  
Status:  
New hard copies have arrived for distribution.

#### 1.2.3.1. Recycling education

Lead Office: OPPTA

Continue educating students, teachers, consumers, public officials and businesses about the benefits of recycling and related source reduction activities through presentations, publications, guidance documents and technical assistance programs.

By: 6/30/03

Percent Complete  
50%.  
  
Status:  
Participating in conferences, public meeting, summer camps, Solid Waste Management Districts activities, board meetings and general grant activities sharing information on the benefits of recycling and source reduction activities. Presented education presentations to schools and participated in festivals throughout Indiana as a part of the Indiana Department of Environmental Management's Earth Day celebrations. Developed and revised a "Reduce Unwanted Mail" Web page and brochure with the assistance of our media group.

Conducting an illegal burning workshop for public officials in partnership with groups like Southern Indiana Recycling Initiative (SIRI), Northern Indiana Recycling Initiatives (NIRI), Association of Indiana's Solid Waste Management Districts (AISWMD), and Indiana Association of Cities and Towns (IACT).

By: 6/30/05

Percent Complete  
50%.  
  
Status:  
Ongoing. Don't Burn – Recycle! Regional grant participants kicked off the public outreach campaign in mid-May with newspaper, TV and radio advertising, as well as billboards. Participants continue to work with their local elected officials, law enforcement, and fire departments to help them understand that backyard trash burning is illegal and dangerous. Six public forums have been held to-date: Southern Indiana Recycling Initiative, Household Hazardous Waste Task Force, City of Rockport, City Bicknell, Crawford County Commissioners, and Spencer County Commissioners.

#### 1.2.3.2. Partnering with universities on research and technical issues

**Partner with Indiana universities**

Lead Office (s): OPA, MACS, OCR

Partner with Indiana Universities to further our outreach, education, knowledge sharing, research and technical knowledge. Staff will work to set up cooperative internships, joint meetings, outreach information booths and sessions, publication distribution and general sharing sessions (in person, by phone and electronically) to increase our state-university relationships.

Ongoing

Percent Complete  
50%

Status:

IU staff is participating in the Indiana Environmental Justice Advisory Committee (IEJAC). In addition, efforts are underway to reach out to approximately 15 Indiana colleges and universities to determine their interest in partnering with IDEM on a variety of issues or projects.

### **Establish Industrial Pollution Prevention Internships**

Lead Office: OPPTA

Work with Human Resources to consider the development of an internship program with OPPTA/CMTI. Work with Clean Manufacturing Technology Institute (CMTI) to evaluate the possibility of a college pollution prevention internship program. This program would allow engineering students to assess participating facilities for pollution prevention opportunities.

By: 6/30/04

Percent Complete  
100%

Status:

The Office Pollution Prevention Technical Assistance (OPPTA) has met with Human Resources to discuss the possibility of Pollution Prevention (P2) Internships. The resulting discussions found that if no federal grant is received for the program, interns would be hired as "Unpaid Interns". OPPTA did apply for and secure a summer intern with the Governor's Intern Program. This intern worked within OPPTA to assist in planning the Annual P2 Conference and also researched P2 Training Materials for Agency Staff.

Further research and discussions have been held with the Clean Manufacturing Technology Institute (CMTI) to determine feasibility of an on-going P2 internship program. CMTI is interested in pursuing this opportunity and has been working with OPPTA to research other state P2 Internship programs. Human Resources contacted Purdue University to determine the interest in an "Unpaid Intern" program with their School of Engineering. There is an interest from Purdue for unpaid interns.

The Indiana Department of Environmental Management is therefore interested in pursuing this further and will consider applying for a Pollution Prevention Incentives for States grant in the next biennium to fund this project for the first 2 years and work with another entity such as CMTI or the Purdue University Advanced Technology Center to fully implement and provide on-going management and funding of a P2 intern program.

#### **1.2.3.3. Expanding environmental education communication with legislators and Indiana businesses**

Lead Office: OBLR

To help legislators better understand the complexity of environmental regulations; IDEM will expand its education efforts in this area by:



Planning at least 10 educational visits with legislators in their districts, including touring wetlands, agricultural operations, wastewater treatment facilities and other environmental-related programs.

Meeting with at least half of the environmental affairs committee members of the House and Senate, visiting a priority environmental concern or success in their district.

Planning an educational forum as part of the Environmental Quality Service Council where IDEM program staff will explain their roles and responsibilities.

Holding meetings with environmental representatives and leaders of business, industries and municipalities across the state that could include touring a steel plant, power plant or a wastewater treatment plant.

Ongoing during May – December 2003 and 2004

Developing relationships with business and industry organizations through one-on-one interaction.

Ongoing

Working with the Compliance and Technical Assistance Program and IDEM program areas to assist Indiana's businesses with compliance questions, permits and technical assistance.

Ongoing

Working closely with the Indiana Department of Commerce's Business Ombudsman and IDEM's Office of Pollution Prevention and Technical Assistance to encourage new and existing companies to comply with environmental regulations.

Ongoing

Making special efforts to contact endangered industries, such as foundries, which are declining in the state, by providing compliance assistance, and technical and permit assistance.

By: 12/31/04

Percent Complete  
50%

Status:

Set up three meetings with legislators regarding issues in their districts. Met one-on-one with Sen. Beverly Gard. Met with representatives of a wood company in Logansport at Sen. Tom Weatherwax's request. Met with representatives of Waupauca Foundry, Sen. Richard Young and Department of Commerce staff. Met with Rep. Wolkins and Sen. Adams and representatives of Grace College in Winona Lake; met with Elkhart Chamber of Commerce and Sen. Riegsecker; met with Sen. Hume, Rep. Chowning and local elected officials in Bicknell; met with Sen. Craycraft and Rep. Liggett and attended a meeting of the Delaware County Commissioners and met with Sen. Gard, Rep. Cherry and members of the Hancock County Economic Development Council.

Responded to 314 legislative requests and 15 from business, industry and academia. Met with representatives of Lilly, met with representatives of Alcoa/Lafayette, met with representatives of magnet wire industry. Provided information to all legislators, business groups and local government groups on emissions credit registry.

#### 1.2.3.4. Heighten agency profile throughout Indiana

Lead Office: OCR

**Expand community outreach**

IDEM participates in or hosts several community events each year, such as the Governor's Conference on the Environment, Indiana State Fair, Black Expo, Earth Day, Earth One Festival, etc. IDEM also interacts with local elected officials (i.e. Mayors, Town Council Presidents) to educate, assist and update them on various environmental issues that affect their community.

**IDEM will identify new opportunities to promote the agency and its services constituent groups by:**

Participating in additional community festivals and appropriate events.

Expanding its Speakers Bureau services and promoting that service statewide.

Maintain relationships and develop new relationships with local elected officials in order to assist local communities on various environmental issues.

Through: 6/30/05

Percent Complete  
100%

**Status:**

Speaker's Bureau: Staff updates continue to be made as needed to the list. The site is readily available to visitors to the website as part of the "Visitor's Center."  
IDEM continues involvement in local community events and holds meetings with environmental groups."

### 1.3. Prioritize Services and Programs to Achieve the Greatest Improvement in Air, Water and Land Quality

The Offices of Air Quality, Water Quality, Land Quality, Pollution Prevention and Technical Assistance, and all support offices will prioritize assignments, wherever discretion is available, in permitting, compliance, enforcement, assistance, rulemaking, monitoring environmental quality and other functions that will achieve the greatest benefit in improving air, water and land quality.

Each Office will ensure that its priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting environmental quality across the state.

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#### Leads

Janet McCabe, Jim Mahern, Tim Method (Acting OWQ Asst. Commissioner), and Bruce Palin

#### Each Office will:

1. Designate managers in each major program area for overall responsibility to prioritize the area's work (probably branch chiefs, but could be others in some circumstances.)
2. Conduct a semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection. This review should include a semi-annual presentation and discussion among the office's senior management. Adjustments to work plans will be made as indicated by this review and coordinated with scheduled EnPPA updates.
3. Program areas within the offices that currently have formal systems in place to prioritize work (e.g. the Compliance Monitoring System in the Office of Air Quality) shall employ those systems to set priorities and annually assess whether the systems need adjustment.
4. Program areas that do not have such systems in place will develop criteria for setting priorities and develop at least an informal structure for setting priorities.
5. These regular evaluations will consider available resources, changing state and/or federal directives, and multimedia or cross-office implications.

#### 1.3.1. Prioritize Office of Air Quality Services and Programs

Lead Office: OAQ

EPA Role: Work with IDEM to remove barriers to issuance of individual Title V permits, for example for facilities with pending federal enforcement actions. Assist with technical and legal questions, especially with major source permits.

Percent Complete  
100%

#### Status:

Completing the current EnPPA sets many of the priorities for the biennium. OAQ's senior management reviewed their processes for setting priorities. In addition to a semi-annual review of priorities, we will improve our process for involving all parts of OAQ in establishing our yearly compliance priorities. That is the area where we have the most discretion to make choices.

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Percent Complete  
50%

Status:  
Completed review of priorities as of 12/31/03. Our ENPPA midterm review had constituted the second semi- annual review of priorities.

Issue all Title V permits to sources whose applications were submitted prior to June 30, 2002.

By: 12/31/03

Percent Complete  
90.5% as of July 1, 2004

Status:  
Issued: 716  
Pending: 75, of which 42 have been to PN.

Meet all mandated permit deadlines 100% of the time.

Ongoing

Percent Complete  
50%

Status:  
There were no late permits during the first year of this agreement..

### 1.3.2. Prioritize Office of Land Quality Services and Programs

Lead Office: OLQ

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Percent Complete  
100%

Status:  
OLQ has identified Excess Liability Trust Fund (ELTF), RCRA Correction Action, beyond Government Performance and Review Act (GPRA), Waste Tires, Confined Feeding Operations (CFOs) Permitting (CAFO/NPDES specifically), Managing Risk Integrated System of Closure (RISC) Resources, contract management, and data management as our priorities.

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05

Percent Complete  
50%

## Status:

Additional staff resources allocated to Enhanced Liability Trust Fund (ELTF). RCRA Corrective Action sites are currently being reviewed by staff to reevaluate prioritization. The Confined Animal Feeding Operation (CAFO)/National Pollutant Discharge Elimination System (NPDES) Rule was final adopted by the Solid Waste Management Board on March 24, 2004. A Contract Request document was finalized, and forwarded to staff.

### 1.3.3. Focus Internal Resources to Address Most Significant Water Quality Issues

Lead Office: OWQ

EPA Role: Conduct an initial review and then periodically review to ensure that all areas of the Office are focused on highest, best use of staff time and resources to gain water quality improvements and most critical services to citizens.

Ensure that OWQ Priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting the water quality across the state.

Conduct a semi-annual review of OWQ activities to ensure that all work continues to be prioritized to provide efficient/effective services and is oriented toward making a significant difference in water quality improvement and protection. The review will include, at a minimum, a presentation by each branch chief on current activities and any planned changes to those activities to the OWQ senior management team. Adjustments as necessary will be made by the team.

By: 7/1/03 and biannually thereafter

Percent Complete  
25%

## Status:

A semi-annual review was conducted on January 29, 2004 by the Deputy Commissioner of Environmental Results and the OWQ branch chiefs. Largely, the OWQ is on track with the EnPPA commitments. However, due to state legislation, a couple of issues were identified that should ultimately be revised in the EnPPA. These issues include the implementation of the state wetland regulatory permit program per HEA 1798, and regulation of small public water supplies. We anticipate these changes to the EnPPA to occur during the mid-term review on June 30, 2004.

### 1.3.4. Prioritize Office of Pollution Prevention and Technical Assistance Services and Programs

Lead Office: OPPTA

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Percent Complete  
50%

Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA) utilizes the environmental performance partnership agreement as a planning and priority-setting dialogue between its staff, managers, and assistant commissioner. This exercise is conducted on a biennial basis. Progress is monitored/tracked utilizing the EnPPA through quarterly update process.

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Percent Complete

50%

Status:

Through this activity-based reporting, the quarterly updates to the EnPPA, The Office of Pollution Prevention and Technical Assistance (OPPTA) measures both fulfillment of its commitments under the agreement and provides the information to analyze the effectiveness of different approaches to environmental protection. Basic program performance and fiscal responsibilities are monitored, through progress discussion between the Branch Chiefs and Assistant Commissioner on a quarterly basis. The information provided by the office may be evaluated on a semi-annual basis through presentation and discussion among the Indiana Department of Environmental Management (IDEM) senior management and the commissioner at Senior Staff meetings.

## 1.4. Reducing Key Environmental Threats

As federal officials continue to advise Americans of the dangers that exist throughout the country, and the world, IDEM is working to ensure Hoosiers are protected from bio-terrorism activities and associated environmental hazards while also expanding its efforts to reduce other environmental risks.

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### Leads

Paula Smith

**As part of its goal to keep Hoosiers from harm, IDEM will address issues of homeland security by:**

#### 1.4.1.

**Filling a newly created position dedicated to drinking water security and infrastructure protection.**

Lead Office: OWQ

The Office of Water Quality Security & Counter-Terrorism Coordinator will work in concert with key staff in the Office of Land Quality and the Office of Air Quality, as needed, to ensure that the agency participates effectively in the counter-terrorism efforts.

Ongoing

Percent Complete  
100%

#### Status:

The Counter-Terrorism (C-T) Coordinator has attended 2 formal Counter-Terrorism Security Council (C-TASC) meetings and has participated in a meeting of Lake Michigan military, and law enforcement personnel about lake drinking water intake protection as well as shoreline industry and recreational facilities. The C-T Coordinator has participated in a briefing by the US Attorney regarding the USA Patriot Act as well as a conference of C-T Coordinators and Law Enforcement on Domestic Terrorism. The C-T Coordinator continues to interact with C-TASC and the Indiana State Department of Health specifically on drinking water issues. The C-T Coordinator coordinates with the State Emergency Management Agency (SEMA) on water security matters regarding the development and implementation of the State's Comprehensive Emergency Management Plan. The C-T Coordinator is the Water Sector Gatekeeper for the newly activated Indiana Alert Network which is an interactive network of critical infrastructure stakeholders, emergency management, law enforcement, and security agencies. The coordinator serves on the Agriculture Bioterrorism Task Force.

Be the point of contact for matters relating to infrastructure security.

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

The Counter-Terrorism (C-T) Coordinator attends monthly Counter-Terrorism & Security Council (C-TASC) meetings and participates in a meetings of Lake Michigan military, and law enforcement personnel about lake drinking water intake protection as well as shoreline industry and recreational facilities. The C-T Coordinator has participated in a briefing by the US Attorney regarding the USA Patriot Act as well as a conference of C-T Coordinators and Law Enforcement on Domestic Terrorism. The C-T Coordinator continues to interact with C-TASC and the Indiana State Department of Health specifically on drinking water issues

**1.4.2.****Coordinating with the State Emergency Management Agency to develop and implement emergency response plans.****1.4.3.****Involvement in multi-agency counter-terrorism and hazmat response forums and the State Emergency Management Agency advisory committee**

Lead Office: OLQ

Participate in multi-agency counter-terrorism and hazmat response forums (Counter-Terrorism and Security Council, Safe Schools Advisory Council, Purdue University Homeland Security Institute, U.S. EPA Region 5 Regional Response Team.)

Provide staff and support to the Indiana Emergency Response Commission

Provide after hour's duty roster of IDEM staff to State Emergency Management Agency for staffing the State Emergency Management Agency's Emergency Operations Center.

Participate in State Emergency Management Agency advisory committee regarding Federal Emergency Management Agency and Department of Justice counter-terrorism grants.

**1.4.4.****Counter-terrorism response plans**

Lead Office: OLQ

Participate in developing and updating multi-agency counter-terrorism response plans and all hazards plans. (Indiana State Agency Comprehensive Emergency Management Plan, U.S. EPA Area Contingency Plans for Indianapolis and Louisville, Board of Animal Health Foreign Animal Disease Plan, Indiana Continuity of Government Plan)

During: FY 2003 – 2005

Percent Complete

50%

**Status:**

Emergency Response participation is ongoing

**1.4.5.****Counter-terrorism and hazmat response and recovery exercises**

Lead Office: OLQ



Contribute to the design and participate in local, state, and federal counter-terrorism and hazmat response and recovery exercises. (Chemical Stockpile Emergency Preparedness Plan (CSEPP (VX)), Operation River City (Louisville), Hoosier Guardian, Local Emergency Planning Committee exercises, Pipeline Group tabletops).

#### **1.4.6. Drinking water system response protocol**

Lead Office: OWQ

Coordinating with the State Emergency Management Agency (SEMA) to develop a drinking water system response protocol that will be incorporated into Indiana's Statewide Comprehensive Emergency Management Plan (CEMP). The response protocol will be designed to address two important aspects of emergency planning and response. First, the protocol will address how specifically the State will respond to an incident, real or threatened, at a public water system. The second portion of the protocol will deal with the decision making process for determining what to communicate to the public and what steps to take regarding the safety and use of the drinking water based on the findings of the initial investigation.

By: 1/31/04

Percent Complete  
70%

Status:  
Vulnerability Assessment was conducted by Titan Corp staff to 30 select state staff in May 2004. Representatives of IDEM drinking water, emergency response, hazardous waste and enforcement programs, as well as the State Department of Health, and SEMA attended the training.

A CEMP workgroup has been formed and 2 meeting have been held with contractor Titan Corp. to develop a drinking water plan to respond to terrorist attacks. Draft documents have been produced and are under internal review. The final CEMP will be finished and presented to the Counter-Terrorism & Security Council by the end of the year.

#### **1.4.7. Vulnerability assessments and emergency response planning**

Lead Office: OWQ

Training drinking water staff, waste water staff, emergency response staff, Indiana Department of Health, and State Emergency Management Agency staff in performing vulnerability assessments and emergency response planning.

Provide assistance to community systems serving over 3,300 population in meeting federal requirements. Report number of systems assisted quarterly.

Ongoing through 6/30/05

Percent Complete  
100%

Status:  
Through the services of the Alliance of Indiana Rural Water Association, the National Rural Water Association state affiliate, all required vulnerability assessments were completed and submitted to EPA by the June 30, 2004 deadline

Provide assistance to community drinking water systems serving less than 3,300 population and non-community systems. Report number of systems assisted quarterly.

Ongoing through 6/30/05

#### 1.4.8. Reduce the potential for bioterrorism

Lead Office: OWQ

Working with existing programs such as wastewater, hazardous waste, confined feeding and drinking water to develop strategies to protect existing facilities, reduce the potential for bioterrorism and ensure that there is an effective response should an incident occur.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

The Counter-Terrorism Coordinator has established working relationships with all state counter-terrorism programs. The coordinator is a member of the Counter-Terrorism & Security Council and the Agricultural Bioterrorism Task Force. In addition, the coordinator serves on the ASDWA Terrorism committee. The coordinator is working to develop a training session to be incorporated into OSHA HAZWOPER training required for most of the IDEM field staff.

#### 1.4.9. Records Management

Lead Office: OLC

Ensure records currently considered public and to be disclosed upon request do not enhance opportunities for terrorist strikes.

Ongoing

Percent Complete  
60% for Drinking Water which will be a model for other programs

Status:

House Enrolled Act 1935 was enacted by the legislature giving the ability to keep confidential, public records that contain information found in or relating to vulnerability assessments and other emergency response documents. Staff are working with Office of Legal Counsel, and the Counter-Terrorism & Security Council to develop guidance on justifiable waivers to confidentiality and how to reconcile possible conflicts with other laws and requirements such as Environmental Impact Statements required by NEPA and the Wellhead Protection Program. Draft guidelines have been developed and tested for full implementation. In addition to waivers of confidentiality, discussions have taken place with stakeholders regarding the development of an employee confidentiality statement/certification to insure all Indiana employees that may have access to confidential information do not improperly transmit such information. The system is currently being tested with a legal discovery request for information. Additional procedures are being developed to address such requests. Requests for Source Water Protection Area information are being screened and a new interactive web site has been developed to provide access to information to determine whether a particular site is located in a source water protection area without pinpointing actual well or intake locations.

**IDEM will address the need to reduce other environmental risks through the following:**

#### 1.4.10. Risk Advisory Committee

Lead Office: OPA

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Through: 6/30/05

Percent Complete

0%

Status:

Due to staffing issues, this group has not been able to move forward. New staff person was hired and we hope to move this group forward within the next quarter.

Lead by IDEM's Office of Planning and Assessment, IDEM program offices (specifically, Office of Air Quality, Office of Land Quality, Office of Water Quality and the Office of Pollution Prevention and Technical Assistance, will work to:

Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list.

By: 12/30/03

Percent Complete

0%

Status:

See above.

Develop a process to make better risk-based decisions and allocation of resources.

By: 6/30/04

Percent Complete

0%

Status:

See above.

Assist other IDEM offices in addressing their priority contaminants.

By: 6/30/05

Percent Complete

0%

Status:

See above.

Participate in agency-wide meetings.

Through: 6/30/05

Percent Complete

0%

Status:

See above.

#### 1.4.11. Risk Integrated System of Closure

Lead Office: OLQ

Continue to coordinate and implement recommendations from the Risk Advisory Committee on toxics reduction efforts across the agency.

Institutionalize the Risk Integrated System of Closure policy (i.e. Project Manager and Technical staff training, additional resources for Risk Integrated System of Closure reviewers).

By: 6/30/04 and 6/30/05

Percent Complete

50%

Status:

The bi-weekly RISC Availability Sessions for staff have completed the study of the entire Technical Guide. A special session was held for studying Plume Stability and Attenuation Monitoring. Staff interest and concerns will be monitored, and additional special availability sessions will be held on an "as needed" basis.

Evaluate reallocating more staff resources to completing Risk Integrated System of Closure reviews.

By: 6/30/04 and 6/30/05

Percent Complete

50%

Status:

Staff resources and tasking are discussed in bi-weekly RISC Advisory Board meetings. Bi-weekly meetings of the RISC Technical Specialists and support staff continue to coordinate resource allocation, prioritize tasks to support staff, etc.

Evaluate current Risk Integrated System of Closure Manuals for improved clarity and organization in an effort to provide complementary manuals that are user friendly.

By: 6/30/04 and 6/30/05

Percent Complete

50%

Status:

Portions of the User's Guide, Chapter 2 (RCRA) have been updated, and Chapter 3 (Leaking Underground Storage Tanks (LUST)) first draft was completed and had received limited internal review. Six (6) public outreach sessions were conducted throughout the State. The Technical Guide Appendix 1, Default Closure table, was updated and posted on the web by January 1, 2004. Eleven (11) new compounds were added. A poster session presentation on RISC was made at the American Chemical Society meeting. A guideline for providing an alternate water supply was drafted, and has been reviewed by the Drinking Water Branch of OWQ. A guideline for health-based vapor intrusion action levels was drafted.

Improve coordination with all sister agencies who have tasks related to Risk Integrated System of Closure in an effort to define roles and responsibilities for greater resource efficiency.

By: 6/30/04 and 6/30/05

Percent Complete

50%

Status:

Preliminary discussions held with staff at Indiana State Dept. of Health to improve coordination. Indiana Dept. of Transportation representatives attend the RISC Availability Sessions. Coordinated with Indiana Occupational Safety & Hazard Administration (IOSHA) on the vapor intrusion guidelines. Developing a public information piece about vapor intrusion with the Indiana State Department of Health (ISDH).

Develop and implement timeframe for finalizing the Total Petroleum Hydrocarbons and Vapor Intrusion policies.

By: 6/30/04 and 6/30/05

Percent Complete

80%

Status:

A second draft of the proposed policy has been developed for Total Petroleum Hydrocarbons, and comments from the Total Petroleum Hydrocarbons (TPH) Work Group have been incorporated. Concerns about analytical laboratory procedures are being investigated. Once they are resolved, a draft will be ready for distribution to staff of OLO. Vapor Intrusion is on hold pending contract issues. The Alternate Water Supply non-rule policy has reviewed and commented on by OWQ Drinking Water Branch staff. The final draft is waiting for examples of Short Term Action Levels to be developed for BTEX and some chlorinated solvents before starting down the Nonrule Policy Document (NPD) path.

#### 1.4.12. Address Mercury Issues

Lead Office:  
OPA/OAQ

**As an agency, IDEM will focus on:**

Implementing recommendations for next steps to reduce mercury emissions.

Through: 6/30/05

Percent Complete

60%

Status:

Workgroup members have been working to identify and quantify emission sources into an inventory. The United States Geological Survey (USGS) is using this preliminary information and relating it to its findings regarding atmospheric deposition of mercury. In turn, OPA is using this information as it works to address electric utilities in Indiana.

Key workgroup members are also involved in meetings with USGS regarding continuation of the air deposition monitoring agreement.

Developing overall multi-media mercury reduction plan, identifying the various mercury "loads".

Through: 6/30/05

Percent Complete  
35%

Status:

With the preliminary inventory emissions, we are in a position to identify the sources that are contributing the greatest "loads" and provide that information to the relevant program areas within IDEM.

Continuing implementation of the mercury deposition monitoring project and analysis of data in coordination with United States Geological Survey and issue final report.

Through: 6/30/05

Percent Complete  
75%

Status:

Monitoring is ongoing for both wet and dry deposition of mercury and trace metals. Data analysis continues for mercury events that are considered large when compared to other sites and seasons in the database. We are in the process of discussing future activities related to ongoing monitoring.

#### 1.4.12.1. Mercury Inventory and Data Analysis

Gather and analyze mercury data to provide key information to guide IDEM's mercury water quality planning efforts, a part of a regional and local strategy. Data would include the United States Geological Survey/IDEM mercury monitoring project, trace metals sampling in surface water, and fish tissue sampling data.

Chart USGS data and Cross reference USGS data with IDEM data.

By: 9/30/04

Percent Complete  
20%

Status:

Tables with Mercury emissions (estimates/reported emissions) have been developed by OAQ for the years 1996, 1997, 1999, 2000, and 2001. The data beginning with 1999, and afterward, is the most reliable. It has been decided there are a few errors in the 2000 data that will be fixed, and then the "by county", and "by source" mercury emissions data will be resorted, and forwarded to USGS for possible correlation with their deposition data.

List Mercury (Mercury) reduction actions/projects IDEM has already taken.

By: 10/31/03

Percent Complete  
65%

Status:

An earlier, 2000, document has been revised, and now is being reviewed by other IDEM staff working on Mercury projects, who will make additional corrections to the list of actions taken.

Get latest (2000) rapids (EPA) data and analyze it to compare with 1997 and 1999 rapids data (this data is released biennially).

By: 10/31/03

Percent Complete  
50%

## Status:

We now have data for both 2000 and 2001 to go with the earlier 1996 and 1997 data. 2002 data will be available later this year. The 2000 data requires some correction. Once the 2000 data is available, the tables comparing 1997, 1999, 2000, and 2001 will be resorted in rank order.

Assess impact of more stringent federal rules on medical waste incinerators.

By: 12/31/03

Percent Complete  
40%

## Status:

The more stringent federal rules on medical waste incinerators has lead to all but 7 such sources in Indiana shutting down. The data gathered before 1999 is both the most plentiful and least accurate. This project will be finalized before the next update.

Gather available data on reported Mercury discharges from Indiana publicly owned treatment works (POTWs).

By: 6/30/05

Percent Complete  
0%

## Status:

Project not yet begun because of the lack of available and reliable discharge data from the POTWs.

In conjunction with the wastewater triennial review, determine, as fully as possible, the various sources of Mercury in the influent of POTWs.

By: 12/31/04

Percent Complete  
45%

## Status:

OPA is participating in OPPTA's workgroup on this topic. We continue to help identify the various sources.

#### 1.4.12.2. Mercury Exposure and Education

Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
IDEM continues to participate on National groups and helps lead the ECOS Quicksilver groups. Mercury efforts continue to include commenting on the new mercury rule.

#### 1.4.12.3. Mercury Thermostat Reduction & Recycling Program

Continue to promote and manage the thermostat program and attend HVAC-R (heating, ventilation, air conditioning and refrigeration) association meetings.

Through: 6/30/05

Percent Complete  
50%

Status:  
OPA submitted an article for the Air Conditioning Contractors Association (ACCA) newsletter. ACCA has recently expanded to a state-wide organization, and has a potential to reach suppliers and contractors throughout the state.

OPA is working with the Product Stewardship Institute (PSI) to work with a variety of partners to gather information regarding improving the recycling rate of mercury thermostats.

OPA staff also met with staff from the Office of Air Quality (OAQ) regarding an outreach program to demolition contractors that would encourage them to recycle mercury-containing items prior to demolishing buildings. OPA is in the process of revising its pledge forms and customer brochures, and OAQ will distribute the material, as needed.

Conduct annual outreach to the thermostat program participants to ensure they are properly serviced by the Thermostat Recycling Corporation and that they have an adequate supply of IDEM promotional materials.

By: 6/30/04 and 6/30/05

Percent Complete  
20%

Status:  
Draft letter is in progress. Web site has been updated. Updated brochures are in process.

#### 1.4.12.4. Dental Mercury Program

Work with the Indiana Dental Association, the Indiana State Department of Health, and other interested parties to develop an environmental pledge program for Indiana dentists. In addition to mercury, the pledge will address lead and silver.

By: 6/30/04

Percent Complete  
0%



Status:

The scope of this project has changed, as IDEM has decided to move forward with a proposed variance that would be available for the various POTWs to adopt, if interested. OPPTA received a grant, and is working on this effort.

Working with the Indiana Dental Association, and the Indiana State Department of Health, conduct outreach to Indiana Dentists to encourage them to participate in the pledge program.

By: 10/31/04

Percent Complete

0%

Status:

See above.

Upon request, assist Indiana dentists by providing information and assistance as they work to join the pledge program. This may include site visits, providing information, and/or developing guidance documents.

Through: 6/30/05

Percent Complete

0%

Status:

See above.

Work with the Indiana Solid Waste Management Districts (SWMDs) to coordinate the proper management of dental waste. Assist participating dentists with finding proper vendors for their waste.

Through: 6/30/05

Percent Complete

70%

Status:

Working with OPPTA staff to determine which Solid Waste Management Districts (SWMDs) will accept dental waste. Revised and expanded the list of dental recyclers, which has been submitted to MACS for posting to IDEM's website.

#### 1.4.12.5. Mercury Deposition Monitoring

Continue and complete implementation of mercury deposition monitoring project; complete analysis of data in coordination with United States Geological Survey, issue final report.

Through: 6/30/05

Percent Complete

50%

Status:

The project is underway and runs through Sept. 2004, at which time the data will be finalized and the report drafted.

#### 1.4.12.6. Mercury Switch Removal

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

Percent Complete

Development of informational materials 100% Complete; implementation is on-going.

Status:

OAQ continues to work with these contractors. Fact Sheet for asbestos renovation/demolition contractors developed and being posted on website. Fact Sheet and Mercury Awareness Program pamphlet identifying mercury containing items to be given out by field inspectors during on-site inspections. Will consider other outreach strategies such as holding a public meeting for asbestos renovation/demolition contractors to educate them on mercury switch removal. Indianapolis OES added a similar provision in their contract with IDEM to provide outreach to asbestos renovation/demolition contractors.

#### 1.4.12.7. Mercury & Schools

Lead the school mercury reduction and recycling pledge program. Conduct outreach campaign and offer assistance to schools, Solid Waste Management Districts, and the City of Indianapolis where needed.

Through: 6/30/05

Percent Complete

50%

Status:

405 Indiana schools now participate in the pledge program having inventoried their buildings for mercury and mercury-containing items, taken all items for proper recycling to their local solid waste management district, and signed the pledge to phase out the purchase of such items.

#### 1.4.13. Enviro-School Program

Lead Office: OPA

EPA Role: Provide funding and guidance.

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

Through: 6/30/05

Percent Complete

45%

Status:

The selected contractor, Environmental Management Institute (EMI), will act as project manager. IDEM staff has met with the contractor to provide background information to move the project further. Contract documents are in the signatory process and the next meeting has been tentatively scheduled for the end of August.

#### 1.4.14. Continue toxics assessment project at school 21 in Indianapolis by conducting monitoring activities, other grant activities and issuing final report.

Lead Office: OAQ

EPA Role: Assist with oversight of federal grant, provide technical assistance on risk characterization activities and interpretation of monitoring data.

School 21 (Indianapolis) Toxics Assessment Project. Conduct monitoring activities, complete other grant activities and issue final report.

By: 8/30/04

Percent Complete  
50%

Status:  
The audit of Citizens Gas commenced April 2004. Risk characterization is progressing and initial model runs have begun. Monitoring activities continue. Report will not be final until the end of 2004

#### 1.4.15. Address Potential Environmental and Health Threats in Homes and Communities

Lead Office: OPA

##### Expand the Children's Health Program:

Partner with the Indiana State Department of Health and Indiana Family Social Services Administration to expand the Children's Health Program on areas such as asthma triggers, integrated pest management practices, lead prevention to include sensitive populations located in long-term care facilities, hospitals and rehabilitation centers.

By: 12/1/04

Percent Complete  
0%

Status:  
At this point, IDEM does not have the staff to take on long-term care facilities. Due to staff shortage issues and funding issues, IDEM will need to discuss internally if this project is possible.

#### 1.4.16. Integrated Pest Management (IPM)

Lead Office: OPA

Work with schools and child care facilities and the Indiana Family and Social Services Administration to implement the Integrated Pest Management (IPM) model that was developed from the pilot project.

Ongoing through 6/30/04

Percent Complete  
100%

Status:  
IDEM has partnered with Purdue University to implement the pilot project and pesticide policy developed for childcare facilities. The brochure has been completed and will be promoted with the Children's Environmental Health Program.

**Integrated Pest Management curriculum**

Publish Integrated Pest Management curriculum

By: 6/30/05

Percent Complete  
30%

Status:

The curricula has been developed and reviewed. Will be giving it to MACS to make it available for the Web site.

Conduct outreach to childcare facilities and schools

By: 6/30/05

Percent Complete  
0%

Status:

See above.

**1.4.17.  
Reduce Diesel Emissions**Lead Office:  
OAQ/OPA

Enhance diesel emissions reduction efforts by working to develop and implement projects to reduce emissions from diesel sources, including school bus anti-idling pilots, school bus and/or municipal fleet retrofit projects, truck stop electrification project and development of web-based diesel emissions resource center.

- Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

Percent Complete  
100%

Status:

On April 23 STAI with IDEM support voted to approve an Idling resolution to limit idling in up to 95% of the school systems in Indiana. Staff continue to work to encourage entities to opt-in to the idling policy adopted by the STAI.

- Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

Percent Complete  
85%

Status:

IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, to \$250,000, which will enable 100% of the Evansville school fleet to be retrofitted. Staff continue to work in cooperation with the Northwest Diesel Workgroup.

- Develop and distribute marketing materials for this volunteer program.

By: 6/30/05

Percent Complete  
50%

## Status:

Anti-Idling literature and a sticker or magnet for use in school buses is currently being developed. Anti-idling signs are being designed and the web-based diesel resource center is under construction.

- Investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

Percent Complete  
70%

## Status:

Once State QPA is in place we are ready to move forward on several projects. IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, for \$250,000 to be used on Evansville and Indianapolis school buses. A new grant was filed on July 2, 2004, for the voluntary retrofit program.

- Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

Percent Complete  
0%

## Status:

No activity this quarter.

- Complete the Idleaire truckstop electrification project.

By: 6/30/04

Percent Complete  
60%

## Status:

Total funding is secured. IdleAire and Pilot Truck Stops have executed their contract. We have developed the state contract with NIRPC and IdleAire as a sole-source vendor. DOA has approved IdleAire as a sole source vendor.

**1.4.18.****Environmental Justice**

Under IDEM's Environmental Justice Initiative, IDEM is committed to ensuring that no citizen or community within the State of Indiana, regardless of race, color, national origin, income, or geographic location, will bear a disproportionate share of the risks or consequences of environmental pollution or will be denied equal access to environmental benefits. IDEM has established the Indiana Environmental Justice Advisory Committee to assist IDEM in the implementation of its environmental justice strategic plan and environmental justice principles in all of our programs.

IDEM will continue to address environmental justice by:

**1.4.18.1. Obtaining and integrating demographic and environmental data currently available at IDEM, along with available relevant data from other agencies, and making it available and understandable for communities.**

The EJ Team will update maps and provide information to the Indiana Environmental Justice Advisory Committee (IEJAC), and maintain current information on the web site.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
IEJAC meetings occur on a monthly basis. This group continues to look at ways to incorporate EJ activities into IDEM policies and procedures. In addition, we are seeking federal funding to further help address EJ issues in communities. Information regarding a variety of issues is continually added to the EJ web site. The development of maps will be a continual process and will be update as needed.

Working with programs across the agency, and with other state agencies, for opportunities to conduct workshops for communities and stakeholder groups to educate them about IDEM, environmental issues, permitting, and public participation opportunities.

Integrate Permit Guide and IDEM's Guide for Citizen Participation.

By: 10/31/03

Percent Complete  
80%

Status:  
The guide has been integrated. We have not conducted specific workshops on the guide. Staff has gathered information from other states as to how they have incorporated environmental justice practices into their existing procedures and IDEM is reviewing how and if some of those practices would apply to this Agency.

Developing a customized training model for staff to increase their understanding and sensitivity to environmental justice issues.

The Environmental Justice Team will establish a second round of environmental justice training focusing on how the agency can incorporate environmental justice principles in their work. The training will also focus on current environmental justice activities.

By: 12/31/03

Percent Complete  
0%

Status:  
We have not determined a need for a second round of training yet. No new developments have occurred. However, we may want to incorporate principles from other states once we have finished compiling information.

The Environmental Justice Team will begin conducting the second round of environmental justice training.

By: 12/31/04

Percent Complete  
0%

Status:  
See previous response.

Researching successful mediation programs in other states with the goal of implementing a program for Indiana citizens to actively interact to resolve environmental disputes.

By: 12/31/03

Percent Complete  
80%

Status:  
Information has been gathered in regards to what other states are doing in terms of environmental justice. We are further investigation those states who seem to have developed a successful public participation element. There may also be a change in position descriptions for the Office of Community Relations to include an ombudsman-type role.

**1.4.18.2.  
Provide outreach for Environmental Justice Program**

Lead Office:  
OCR

EPA Role: Provide guidance

IDEM will build on its EJ program by convening regular meetings of the Indiana Environmental Justice Advisory Committee, which will include members from various state agencies to provide a comprehensive approach to environmental justice solutions.

By: 12/31/03

Percent Complete  
100%

Status:  
Numerous meetings have been held - our goal is once a month. There is a good variety of participants from different sectors (state government, private business, academia) and from different parts of the state. Efforts to expand the group will continue to be made.

## 1.5. Building a Better IDEM

To continue the agency's focus on improving our work environment and assuring that our core work is completed efficiently and effectively. IDEM will focus on work place advancements, enhance the way we manage environmental information, and continue to improve our functional efficiencies.

### Sponsor

Susan Moster  
Deputy Commissioner  
Environmental Operations  
(317) 233-0006  
e-mail: [smoster@dem.state.in.us](mailto:smoster@dem.state.in.us)

### Leads:

Environmental Information:  
Laurie Beamish  
  
Workforce Development:  
Brandye Hendrickson and Mark Amick

### IDEM will:

#### 1.5.1. Enhance Efficiency by Leveraging PeopleSoft® Financial Management System

Study all currently available modules and features of the PeopleSoft Financial Management System specifically including contracts, workflow, projects, and time and labor, to determine if additional capabilities can result in greater efficiencies for IDEM processes. Government Management Information System (GMIS),

#### Study Financial Management Information System

Study all currently available modules and features of the PeopleSoft Financial Management System to determine if additional features or modules can result in greater efficiencies for IDEM processes.

By: 4/1/04

Percent Complete  
0%

#### Status:

Unable to complete. Through the upgrade process, we know of only one module that has not been purchased by the state and is not currently in use by IDEM. We must wait for the GMIS section of the Department of Administration to release study the Time and Labor module to us before we can begin to evaluate it. This is not scheduled until FY 06.

Report on the results of the study of all currently available PeopleSoft features and make recommendations to Senior Staff on any additional features that should be further pursued.

By: 6/1/04

Percent Complete  
0%

#### Status:

Unable to complete.



Develop an implementation proposal for any features that were recommended for implementation. This proposal will include any changes to current business practices that will be needed to implement the additional features or modules of PeopleSoft.

By: 9/1/04

Percent Complete  
0%  
Status:  
Unable to complete.

Present any implementation proposals to senior staff and begin the implementation process for any proposals that are approved.

By: 10/1/04

Percent Complete  
0%  
Status:  
Unable to complete.

### 1.5.2. Centralized Web Development

Centralize Web site development/maintenance to integrate program area web pages. This will require the creation of a Web Technical Team. The team will work in concert with Office of Management and Budget Administration – Information Technology staff to ensure that pages are brought to USC § 508 compliance standards.

Create a centralized Web development and management team with defined standard operating procedures and expectations.

By: 6/1/04

Percent Complete  
100%  
Status:  
Four positions have been established and filled. Standard operating procedures and agency standards have been established.

Realign agency Web site to re-evaluate and re-organize information by removing old information, updating Web pages and restructuring information to increase external customers' ease of use and navigability.

By: 6/1/05

Percent Complete  
50%  
Status:  
The agency rules Web site is 100% complete and was made public March 10, 2004. Additional areas to focus on are now being identified.

Create a location for internal customers and populate with information and guidance documents.

By: 12/31/04

Percent Complete  
0%Status:  
Waiting for state information portal change. This will allow creation of special locations/pages for internal customers.

Establish Web site development tools and feedback mechanisms that allow customers to provide input to future site design.

By: 12/31/03

Percent Complete  
100%Status:  
The feedback forms have been created and posted. The Web team is now gathering comments. Development tools have been ordered.

Create and migrate Web site to new common look with input from external customers and focus groups.

By: 6/30/05

Percent Complete  
0%Status:  
The Web team is gathering input from customers and waiting for guidance on new state portal look, feel and structure.

Integrate agency site development with statewide Web initiatives.

Ongoing

Percent Complete  
50%Status:  
The agency is working with state Webmasters and Access Indiana to better integrate and ensure compliance with 508 standards.

Create an on-line publication catalog/archive that will enable external and internal customers' access to all agency publications.

By: 6/30/05

Percent Complete  
65%Status:  
The database system has been created and testing is underway. The Web side interface should be complete by July 2004. The project is now in the Access Indiana work queue.

### 1.5.3. Improve management of environmental data, and build foundation for future data integration efforts:

- Indiana Facility Registry System (I-FRS)
- Geography Network
- Document Management System (DMS)
- Other Office/Data Specific integration efforts

### Agency Data Integration / Data Management Team

Continue efforts of the Data Management Team. The Team ensures that new and enhanced data integration projects are consistent with guiding data management policies. The team also develops and, throughout their office, proactively implements standards pertaining to data management.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

Team has worked on two major proposals (I-FRS & OAQ ACES) and is working to revise Data Management Guide. We were demonstrated the finished I-FRS database and the ArcIMS GIS Wellhead Internet application. Phase 2 of I-FRS has started. Received NEIEN implementation grant for linking GIS data to I-FRS and creating the electronic discharge monitoring report data system.

### Establish Indiana Facility Registry System (I-FRS)

Staff from the Office of Management and Budget Administration (OMBA) Information Technology section and the Office of Planning and Assessment (OPA) will oversee development of, and will implement the Indiana Facility Registry System (I-FRS) to facilitate the exchange of facility data between IDEM and EPA and promote quality environmental data.

Due Date / Through: 6/30/05

Percent Complete  
50%

Status:

The first phase of Indiana Facility Registry System (I-FRS) has been completed. Phase 2 to link I-FRS with current applications using facilities has begun. Underground Leaking, Community Right to Know and Emergency Response System (ULCERS) is first database to be linked.

### Geography Network

Each Office will inventory existing Geographic Information System (GIS) data.

By: 6/30/03

Percent Complete  
100%

Status:

Inventory obtained through GIS Tech Workgroup Reps.

Agency Geographic Information System (GIS) Coordinators, with assistance and input from Agency GIS Tech Workgroup composed of Office Geographic Information System (GIS) data Contacts, will develop plan for creating metadata for program developed data.

By: 10/1/03

Percent Complete  
100%

Status:  
Policy reviewed and recommended by Geographic Information System (GIS) Tech Workgroup. The recommended policy was presented to the Data Management Team (DMT) and approved in the December meeting.

Information Technology Geographic Information System (GIS) staff will develop Geography Network service on IDEM Intranet ArcIMS Server

By: 12/31/03

Percent Complete  
100%

Status:  
Client updates and SDE updates completed. Geography Network development is ongoing.

IDEM Geography Network made available to State Government Network

By: 3/31/04

Percent Complete  
100%

Status:  
As data is being added to the system it is being made available to internal and external users. URL=[http://demweb1/metadata explorer/explorer.jsp](http://demweb1/metadataexplorer/explorer.jsp)

### Document Management System (DMS)

Deploy DMS in 25% of the Agency

By: 8/31/03

Percent Complete  
100%

Status:  
over 25% of the agency has been trained.

Deploy DMS in 50% of the Agency

By: 1/31/04

Percent Complete  
58% of offices or sections have been trained on DMS.

Status:  
Working with OLQ to start adding libraries; lack of training room space has been largest obstacle; now that PeopleSoft training is complete we can progress quicker. Also we are demonstrated DMS capabilities to Enforcement staff on 2/5/04

Deploy DMS in 75% of the Agency

By: 8/31/04

Percent Complete  
0%

Status:  
OMBA/OE/OLC are up next.

Deploy DMS in 100% of the Agency

By: 12/31/04

Percent Complete  
0%

Status:  
Outside current time frame.

#### **Focus on records management issues to include record retention schedules.**

Develop and implement a retention schedule and agency policy for the electronic filing of e-mails. This will assist with reducing the time and effort currently expended for Public Information requests as well as court requests for e-mail.

Develop record retention policy (including e-mails and electronic documents)

By: 12/31/03

Percent Complete  
90%

Status:  
Draft policy has been created; Indiana Commission on Public records (ICPR) has also issued some guidance; draft was provided to Sr. staff for review; will be adjusting it to reflect comments. With Office of Legal Counsel we are drafting a policy and GroupWise curriculum to educate staff on how to follow policy and use GroupWise. Policy needs to go back for Sr. Staff review.

#### **1.5.4. Workforce Development**

##### **Focus on Supporting Our Workforce**

Priority Lead Office: Brandye Hendrickson (OMBA-HR)

Facilitate management panel discussions/focus groups to encourage management participation.

As new agency policies are developed, Human Resources will solicit input from managers.

By: 12/31/03

Percent Complete  
50%

Status:  
Ongoing. Continue to attend section/branch/program meetings to get input on proposed policies and procedures.

Hold employee sounding sessions and manager open forums.

Priority Lead Office: Brandye Hendrickson (OMBA-HR)

As new policies and procedures are distributed, Human Resources will hold sounding sessions and open forums where information can be exchanged and questions can be answered.

By: 12/31/03

Percent Complete

50%

Status:

Ongoing. Have held open forums to answer questions and get input on the revised performance appraisal system, Arrests and Convictions/Background Checks Policies and Telework Policy. Solicited input from Branch Chiefs on Leadership Development series and from Engineer supervisors on Engineer recruitment and retention.

Research options for conducting "360-degree" evaluations.

Priority Lead Office: Rachel Scudder (OMBA-HR)

Human Resources will research available software, other agencies' procedures and ways to give effective feedback to supervisors.

Due Date: 6/30/04

Percent Complete

100%

Status:

Plan to utilize Kouzes and Posner model for evaluation. Hope to advertise availability and discuss at upcoming Sr. Staff meeting and Agency Branch Chief meeting.

### **Succession Planning**

Priority Lead Office: Gail Richards (OMBA-HR)

#### **Develop internal leadership training.**

Human Resources will research and provide options to Senior Staff for leadership training.

Options researched by 12/31/03  
First session held: by 12/31/04

Percent Complete

50%

Status:

Research has been completed. Training has been developed, scheduled and one session has been conducted. First series to be completed by 12/04.

#### **Develop knowledge retention system to deal with employee turnover and retirement.**

Priority Lead Office: Brandye Hendrickson (OMBA-HR)

Human Resources will develop a tool for supervisors to help capture the patterns, processes and skills of high performing employees to prevent loss of valuable knowledge upon resignation or retirement.

Tool developed:

By 6/30/04

Percent Complete

100%

**Status:**

Will encourage Branch Chiefs and other supervisors to create job descriptions and/or standard operating procedures for all positions. Higher level management could incorporate this requirement into supervisor's position descriptions or include in other office priorities.

**Communication Training**

Priority Lead Office: Mark Amick

Establish a media plan for emergency management and crisis communications to enable the agency to efficiently and effectively respond to the news media in the event of an environmental crisis. Identify IDEM crisis communication message themes and strategies for quickly responding to reporters and assign appropriate senior staff and management crisis team personnel.

Assign appropriate senior staff and management crisis team personnel.

By: 9/1/03

Percent Complete  
100%

**Status:**

MACS Media Handbook is complete with all related crisis communication themes. Media training began in January and was provided to all of Senior Staff, Branch Chiefs, and staff at all three regional offices. Periodic training sessions have been offered to all agency staff, and the presentation has been provided to all staff electronically. Training will continue to be offered throughout the year.

Complete and distribute crisis plan

By: 12/1/03

Percent Complete  
100%

**Status:**

Information is complete, contained in the MACS Media Handbook, and Public Information Officers (PIOs) have been appropriately trained. Training and continued education through internal meetings is ongoing.

Review crisis team personnel list every six months and update as necessary.

Create scenario-driven media training plan to prepare IDEM officials for conducting interviews with members of the news media; train for appropriate agency staff.

Priority Lead Office: Mark Amick

Complete media training plan.

By: 9/1/03

Percent Complete  
100%

**Status:**

Information is complete and contained in the MACS Media Handbook.

Train 100% of senior staff.

By: 1/1/04

Percent Complete  
100%

Status:  
Media training has been provided to all senior staff.

Train 75% of agency branch chiefs.

By: 4/1/04

Percent Complete  
100%

Status:  
Media training has been provided to all branch chiefs.

Work with IDEM Human Resources to make media training course available to all appropriate IDEM managers on the Quarterly Training Calendar. Provide public speaking training to appropriate agency staff. Train 50% of speaker's bureau personnel.

By: 9/1/04

Percent Complete  
100%

Status:  
Training has been developed and is available to appropriate IDEM staff.

Provide public speaking training to appropriate agency staff.

Train 50% of Speaker's Bureau personnel

By: 9/1/04

Percent Complete  
100%

Status:  
Training has been developed and is available to appropriate IDEM staff.

Implement any potential organizational changes to enhance efficiencies.

Human Resources will work with program areas to review organizational structures and provide guidance on potential reorganization packages.

Guidance accessible

By: 12/31/03

Percent Complete  
100%

Status:  
As potential reorganization packages are created, Human Resources provides guidance on components and structures and serves as the liaison between State Personnel, State Budget Agency and IDEM.

#### 1.5.5. Expand Health and Safety Training

*Explore possibility of expanding in-house 8-hour training.*



Establish training curriculum relevant to Office of Water Quality, Office of Air Quality, Office of Pollution Prevention and Technical Assistance, and the Office of Legal Counsel for in-house training programs.

By: 9/1/03

Percent Complete

100%

Status:

New training curriculum developed for 2004 updates. Training developed to meet the needs of all program areas.

Implement in-house training of new curriculum.

By: 3/31/04

Percent Complete

100%

Status:

New curriculum presented for OLQ staff. Twelve 8-Hour Updates have been conducted for staff in 2004.

Develop "train-the-trainer" curriculum for in-house First Aid/CPR training.

- Train 25% of field staff in First Aid/CPR.

By: 6/1/04

Percent Complete

40%

Status:

Forty staff received First aid/CPR training in May/June 04.

- Offer training for non-field staff in First Aid/CPR.

By: 12/31/04

Percent Complete

0%

Status:

Not started.

- Compile and disseminate security and personal safety information.

- Conduct informational sessions to discuss relevant building security and emergency preparedness in all IDEM locations.

By: 10/1/03

Percent Complete

100%

Status:

Emergency Action Plan completed, and informational sessions have been conducted. Ongoing process of information dissemination and training. Review of evacuation drills conducted and communicated to all staff through Agency update memos.

- Review and revise Emergency Action Plans for all locations to address concerns recognized from staff during informational sessions.

By: 12/31/03

Percent Complete

100%

Status:

Information from staff used to update and address concerns associated with emergency preparedness. Revised all floor plan maps to exhibit tornado safe areas,

- Disseminate updated Emergency Action Plans to all staff.

By: 2/28/04

Percent Complete

100%

Status:

Distributed Emergency Action Plan to staff. Trained Floor Wardens, conducted informational sessions and procured safety equipment to assist in an emergency.

- Continue involvement in Indiana Government Center Core Team for emergency preparedness to ensure that the Agency's plan is consistent with the campus plan.

By: 5/31/04

Percent Complete

100%

Status:

Continued involvement in campus initiative. Concerns received from staff have been communicated and addressed by Facilities staff.

#### 1.5.6. Address Quality Issues (Quality Management Plan)

EPA Role:

\* EPA Region 5 will provide the IDEM Quality Assurance Manager with relevant information about quality related issues; act as coordinator and conduit for Region 5 State Science Council research and educational activities; and provide guidance on implementing peer review policies and procedures.

\* EPA Region 5 will provide guidance on the use of quality assurance tools and procedures required to evaluate the effectiveness of IDEM's quality system, as well as having a role in actually monitoring and assessing IDEM's quality system and Quality Management Plan.

Continue implementation of management and technical quality assurance and quality control policies and procedures throughout the agency as described by the agency Quality Management Plan (QMP).

Ongoing through 6/30/05

Percent Complete

50%

Status:

Implementation of management and technical quality assurance and quality control policies and procedures is ongoing. Participate in State Science Tribal Network conference calls and coordinated an EPA STAR Seminar.

Quality Assurance (QA) assessment of IDEM's Quality System and Quality Management Plan to include expansion of IDEM QA Team and hold at least quarterly meetings; develop implementation and assessment phase policies and procedures for ensuring consistency of quality assurance practices throughout the agency; perform annual QMP and Quality System review and report to IDEM management and EPA Region 5; and develop a plan and timeline for performing other technical and management assessment processes throughout IDEM program offices.

Ongoing though 6/30/05

Percent Complete  
50%

Status:

A QMP team meeting was held on June 8<sup>th</sup> to discuss management systems review (MSR) scheduled for August 16-19, 2004. Have worked with EPA and program staff to schedule MSR interviews. Have received many program office QMP revisions, and some lists of standard operating procedures, but have not evaluated all revisions for an EPA and IDEM management report. Anticipate completion prior to August MSR. Meeting to discuss development of implementation and assessment policies and procedures will also be in the near future.

Manage quality-related documents, to include the tracking of Quality Assurance Project Plans (QAPPs), in the agency QAPP tracking database; the listing of Standard or Current Operating Procedures (SOPs/COPs), as well as the listing of the myriad of other technical, guidance and non-rule policy documents used within the agency; and identify any 'new' quality-related documents, grants, contracts, and programs that must be referenced in the agency QMP.

By: 6/30/05

Percent Complete  
50%

Status:

The IDEM QA Team has been working to review and revise all quality-related documents for inclusion in the next approved draft of IDEM's Quality Management Plan, to include lists of standard or current operating procedures. Some new program grants have also been identified for inclusion in the QMP--OPPTA CLEAN Community Challenges and the BEACH Act.

Communicate quality-related information by participating in monthly or bimonthly meetings with Region 5 State Science Council. Per our commitment in the QMP, participate in the IDEM 'peer review' panel that will be assembled to develop agency-wide policies and procedures to review and approve study plans and reports for major special studies and other technical documents for publication and distribution. An agency-wide peer review policy and implementation timeline will also be developed.

Ongoing though 6/30/05

Percent Complete  
50%

Status:

OPA has participated in the monthly Region 5 State/Tribal Science Network (STSN -- was previously called the science council) conference calls as well as disseminated information received from the regional coordinator. No development of the peer review panel this quarter, but anticipate some activity following the August Management Systems Review.

**1.5.7. Develop IDEM Strategic Plan**Lead  
Office:  
OPA

Develop/refine a new strategic plan for IDEM to guide future agency initiatives.

**1) Internal document**

6/30/04

Percent Complete  
25% complete

Status:

Memo is complete and we are working to send it to external stakeholders requesting comments on IDEM's current strategic plan. Also working on potential edits, changes and revamp for the next strategic plan.

**2) External draft**

12/31/04

Percent Complete  
0%

Status:

Dependant on internal document being ready.

**3) Final Draft**

6/30/05

Percent Complete  
0%

Status:

Will be ready when above tasks are completed.

## 2. IDEM Office Priorities



## 2.1. Office of Agricultural Relations

The Office of Agricultural Relations serves as a liaison between the agricultural community and IDEM. Working closely with agricultural community leaders as well as individual farmers, the office provides educational information and assistance regarding environmental regulations and policy to members of the agricultural community. The office contributes to the development of policy and rules affecting the agricultural community and assists the community with compliance matters.

Dave Russel  
Director  
Office of Agricultural Relations  
phone: 317/232-8587  
e-mail: [drussell@dem.state.in.us](mailto:drussell@dem.state.in.us)

The office has focused on ongoing federal and state issues concerning livestock production operations for the past several years as the agency developed Confined Feeding Regulations, which became effective in March 2002 after lengthy discussion and debate. Follow-up education and continued discussion will be necessary.

As part of its compliance responsibility, the office makes frequent farm visits and conducts educational outreach to help farmers comply with environmental rules and regulations to preclude the need for agency enforcement.

### 2.1.1. Agency Priorities

#### 2.1.1.1.

PPG (Y/N): N

#### ***Nutrient Management Education for livestock producers***

EPA Role: review

Will create and distribute user-friendly educational materials, fact sheets that can be used by office, as well as third party sources, to reinforce agency's message regarding proper agricultural operations and to explain complicated rules and regulations.

By: 8/1/03

Percent Complete  
100%

Status:  
COPS developed.

A notebook detailing Nutrient Management Planning for the new CAFO/NPDES rule was provided to livestock producers who attended a CAFO/NPDES Video Conference.

### 2.1.2. Office Priorities

#### 2.1.2.1.

PPG (Y/N): N

#### **Expand Communication and Marketing Efforts**

EPA Role: completion of EPA guidance by Spring 2003

Will increase communication with agriculture and mainstream media regarding agricultural issues by developing proactive news releases, letters to the editors, news columns and other publications regarding agricultural issues.

Will build on direct communications efforts with agricultural community and Office of the Commissioner of Agriculture.

Will create and distribute educational materials, fact sheets that can be used by office, as well as third party sources, to reinforce agency's message regarding proper agricultural operations and to explain complicated agency rules and regulations.

Ongoing

Percent Complete  
50%

Status:

Have held one ag media roundtable on CAFO NPDES permit issue; will hold more on upcoming issues. Have established contact list and rapport with Indiana ag media and mainstream media with agricultural interests. Established forum for monthly news column in two agricultural publications.

In addition to developing a News Release promoting the CAFO/NPDES Video Conference, a notebook containing Power Point presentations, the new CAFO/NPDES rule and the copies of the necessary records was developed. Notebooks were given to livestock producers attending the CAFO/NPDES video conference.

Partnered with the Indiana FFA to establish the first ever Environmental Management/Natural Resources Proficiency Award. The award was presented at the State FFA Convention.

Established the first ever Ag Liaison presence at the Indiana State Fair

Established the first ever Ag Liaison presence at the Midwest Pork Conference.

#### 2.1.2.2. Storm water Rules

PPG (Y/N): N

EPA Role: review

Will continue to work with the Office of Indiana State Chemist and Office of Commissioner of Agriculture to develop and explain agricultural component of storm water rules.

Ongoing

Percent Complete  
50%

Status:

Actively engaged in meeting with stakeholders. Developing outreach strategy.

Helped the Office of the Indiana State Chemist and the Office of Land Quality in promoting the series of meetings held around the state explaining Rule 6.

#### 2.1.2.3. Communicate Agricultural Issues

PPG (Y/N): N

EPA Role: Participate in quarterly calls.

OAR will coordinate quarterly calls with EPA to discuss agricultural issues affecting the identified Indiana Department of Environmental Management offices.

By: Quarterly



Percent Complete 0%  Status: In process.
--

## 2.2. Office of Air Quality

The Office of Air Quality (OAQ) works to safeguard the quality of Indiana's air through implementing the requirements of the Clean Air Act, developing and enforcing state rules governing air quality standards, evaluating and issuing permits for construction and operation, conducting compliance activities and monitoring Indiana's air quality.

### Office Contact

Janet McCabe  
Assistant Commissioner  
Office of Air Quality  
(317) 232-8222  
e-mail: [jmccabe@dem.state.in.us](mailto:jmccabe@dem.state.in.us)

Our vision is of clean and breathable air throughout our state, which meets all health-based standards. OAQ strives to achieve our vision to continuously reduce toxic releases, maintain air quality improvements and achieve all health based or air quality standards in our state.

We will continue to pursue our vision by effectively using all resources, including coordinating those within OAQ and other offices in a manner that is both innovative and directly reflective of the agency's environmental priorities and by regularly forming working partnerships with EPA, the regulated community and the general public to achieve environmental results.

### 2.2.1. Agency Priorities

#### 2.2.1.1.

#### Prioritize Services and Programs – Prioritizing Work

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Percent Complete  
100%

#### Status:

Completing the current EnPPA sets many of the priorities for the biennium. OAQ's senior management reviewed their processes for setting priorities. In addition to a semi-annual review of priorities, we will improve our process for involving all parts of OAQ in establishing our yearly compliance priorities. That is the area where we have the most discretion to make choices.

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Percent Complete  
50%

#### Status:

Completed review of priorities as of 12/31/03. Our ENPPA midterm review had constituted the second semi-annual review of priorities.

#### 2.2.1.2.

#### Prioritize Services and Programs – Permits

EPA Role: Work with IDEM to remove barriers to issuance of individual Title V permits, for example for facilities with pending federal enforcement actions. Assist with technical and legal questions, especially with major source permits.

Issue all Title V permits to sources whose applications were submitted prior to June 30, 2002.

By: 12/31/03

Percent Complete  
90.5% as of July 1, 2004  
  
Status:  
Issued: 716  
  
Pending: 75, of which 42 have been to PN.

Meet all mandated permit deadlines 100% of the time.

Ongoing

Percent Complete  
50%  
  
Status:  
There were no late permits during the first year of this agreement..

#### **2.2.1.3.**

#### **Maintain Essential Environmental Services – Agency-Wide Permit Team**

Lead Office: Deputy Commissioner / OPA

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Ongoing through 6/30/05

Percent Complete  
50%  
  
Status:  
Group has been assembled and monthly meetings are held. Workplan developed in the form of a continuously updated topical listing.

#### **2.2.1.4.**

#### **Maintain Essential Environmental Services – Internet Public Notice Standardization**

Lead Office: OPA

Participate in workgroup. Assist OPA in the standardization of public notice information posted via the Internet.

Ongoing through 6/30/05

Percent Complete  
0%

Status:  
No activity this quarter.

**2.2.1.5.****Maintain Essential Environmental Services – Compliance / Enforcement Team**

Lead Office: OE

Routinely participate in Compliance / Enforcement Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

The Air Compliance Branch is currently working with the C/E Team on model enforcement referrals, training for administrative staff dealing with complainants, developing guidance for compliance checks, continuing with the foundry Compliance Action Plan, and working on guidance to maintain electronic evidence. The Team will continue to work on core training requirements for inspectors, access/search warrant issues, addressing steel mill compliance issues and continue coordinated compliance efforts in FY 04/05.

**2.2.1.6.****Reducing Key Environmental Risks – School 21**

EPA Role: Assist with oversight of federal grant, provide technical assistance on risk characterization activities and interpretation of monitoring data.

School 21 (Indianapolis) Toxics Assessment Project; conduct monitoring activities, complete other grant activities and issue final report.

By: 8/30/04

Percent Complete  
50%

**Status:**

The audit of Citizens Gas commenced April 2004. Risk characterization is progressing and initial model runs have begun. Monitoring activities continue. Report will not be final until the end of 2004

**2.2.1.7.****Reducing Key Environmental Risks – Diesel Emissions**

Lead Office: OAQ (Working with OPA)

EPA Role: Help identify grants or other funding sources; provide technical assistance

Focusing on Central Indiana, IDEM will enhance diesel emissions reduction efforts by working to develop and implement projects to reduce emissions from diesel sources, including school bus anti-idling pilots, school bus and/or municipal fleet retrofit projects, truck stop electrification project and development of web-based diesel emissions resource center.

- Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

Percent Complete  
100%

Status:

On April 23 STAI with IDEM support voted to approve an Idling resolution to limit idling in up to 95% of the school systems in Indiana. Staff continue to work to encourage entities to opt-in to the idling policy adopted by the STAI.

- Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

Percent Complete  
85%

Status:

IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, to \$250,000, which will enable 100% of the Evansville school fleet to be retrofitted. Staff continue to work in cooperation with the Northwest Diesel Workgroup.

- Develop and distribute marketing materials for this volunteer program.

By: 6/30/05

Percent Complete  
50%

Status:

Anti-Idling literature and a sticker or magnet for use in school buses is currently being developed. Anti-idling signs are being designed and the web-based diesel resource center is under construction.

- Investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

Percent Complete  
70%

Status:

Once State QPA is in place we are ready to move forward on several projects. IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, for \$250,000 to be used on Evansville and Indianapolis school buses. A new grant was filed on July 2, 2004, for the voluntary retrofit program.

- Implement diesel retrofit programs in Northwest Indiana as funded by an administrative order between USEPA and Ispat/Inland for \$150,000.

By: 6/30/05

Percent Complete  
30%

Status:

East Chicago Schools and City of East Chicago has 100,000 of 150,000 in place and projects schedule to begin upon selection of QPA vendor. QPA specifications have been drafted and Department of Administration is currently drafting a request for proposals. Installation shall begin in July 2004.

- Complete Hammond and school bus retrofit project. Use remaining grant funds for retrofit project in Portage.

By: 5/30/04

Percent Complete

50%

Status:

Hammond fleet is complete and remaining funds will be used for retrofit project in Portage Schools. Waiting on QPA. NO CHANGE

- Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

Percent Complete

50%

Status:

Dieselwise resource center is under construction..

- Complete the Idleaire truckstop electrification project.

By: 6/30/04

Percent Complete

60%

Status:

Total funding is secured. IdleAire and Pilot Truck Stops have executed their contract. We have developed the state contract with NIRPC and IdleAire as a sole-source vendor. DOA has approved IdleAire as a sole source vendor.

#### 2.2.1.8.

#### Reducing Key Environmental Risks – Mercury

Continuing implementation of the mercury deposition monitoring project and analysis of data in coordination with United States Geological Survey and issue final report.

Ongoing through 6/30/05

Percent Complete

70%

Status:

Monitoring is ongoing for both wet and dry deposition of mercury and trace metals. Data analysis continues for mercury events that are considered large when compared to other sites and seasons in the database.

#### Mercury Switch Removal

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

## Percent Complete

Development of informational materials 100% Complete; implementation is on-going.

## Status:

OAQ continues to work with these contractors. Fact Sheet for asbestos renovation/demolition contractors developed and being posted on website. Fact Sheet and Mercury Awareness Program pamphlet identifying mercury containing items to be given out by field inspectors during on-site inspections. Will consider other outreach strategies such as holding a public meeting for asbestos renovation/demolition contractors to educate them on mercury switch removal. Indianapolis OES added a similar provision in their contract with IDEM to provide outreach to asbestos renovation/demolition contractors.

**2.2.1.9.****Coalition Building – Explaining new attainment/nonattainment designations**

EPA Role: Provide guidance on designation and implementation issues

New federal attainment/nonattainment designations are being developed throughout the nation to comply with federal law. These new designations will likely require some Indiana communities to take remedial action. To help explain these new designations and potential actions, IDEM will:

Conduct public meetings, provide materials, and seek input to educate the public about the changes.

## Ongoing

## Percent Complete

65%

## Status:

Outreach on 8-hour ozone is near completion, and will be reinitiated upon federal action. The first phase of PM2.5 outreach is completed. Staff continue to provide presentations and materials to interested groups state-wide as requested.

Submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA

## By:

Fine particle designations - 12/31/03 or other date established by USEPA

Ozone recommendations - 7/15/03

## Percent Complete

100% - Ozone

100% - Fine Particles

## Status:

Ozone - 100% - The July 15, 2003 recommendations were supplemented with results of 2003 ozone season data on October 7, 2003. Further information is being prepared for submittal to US EPA on February 6, 2004.

Fine Particles - 100% - We submitted recommendations to US EPA on February 15, 2004.

**2.2.1.10.****Coalition Building – Reducing environmental asthma triggers**

EPA Role: Grant funding. Advisor to the Environmental Quality Workgroup

Lead Office: OPA, which is co-leading the effort with the Indiana State Department of Health, (Indiana State Department of Health (ISDH)) the Indiana Joint Asthma Coalition (InJAC).

IDEM will work with its co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. Indiana Joint Asthma Coalition (InJAC), established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees. IDEM will:

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems.

By: 10/31/03

Percent Complete

100%

Status:

Initial surveillance report was made to InJAC on March 11, 2004. TRI and air data were included.

#### **2.2.1.11.**

#### **Building a Better IDEM – Centralized Web Development**

Lead Office: MACS/OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to the Office of Media and Communications Services.

Share information on office publications for use in the on-line publication catalog/archive.

#### **2.2.1.12.**

#### **Building a Better IDEM – Agency Data Integration / Data Management Team**

Lead Office: OMBA-BSD

Each agency Office Data Contact (ODC) will actively participate in Data Management Team meetings and activities regarding the agency's data integration effort. Programs must bring all data projects to the Data Management Team for consideration. Office Data Contacts will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance

Ongoing through 6/30/05

Percent Complete

50%

Status:

Ongoing activity.

#### **2.2.1.13.**

#### **Building a Better IDEM – Establish Facility Registry System (I-FRS)**

Lead Office: OPA/OMBA-BSD



Assist with mapping Office of Air Quality's Computer Assisted Approval and Tracking System (and possibly other databases) to the Indiana Facility Registry System.

Ongoing through 6/30/05

Percent Complete  
30%

Status:  
Contract implemented, phase two of project starting will connect to CAATS.

#### **2.2.1.14. Building a Better IDEM – Geography Network**

Lead Office: OMBA-BSD

Participate in Geographic Information System (GIS) data inventory and in drafting and implementing a metadata development plan.

By: 10/01/03

Percent Complete  
100%

Status:  
Initial outreach on 8-hour ozone complete and recommendations made in 2003. Initial PM2.5 outreach completed and recommendations made 2/15/04.

### **2.2.2. Office Priorities**

#### **2.2.2.1. Complete rulemakings to implement federal new source review reform and maintain federal approval of major source permitting program**

PPG (Y/N): N

EPA Role: Provide assistance on federal new source rules; review draft state rule language in accordance with state rulemaking timeframes.

Complete rulemakings to implement provisions of federal new source review rules and to address deficiencies noted in EPA's conditional approval of Indiana's Prevention of Significant Deterioration program.

Final adoption of new source review reform rules.

By: 8/31/04

Percent Complete  
30%

Status:  
Review and documentation will be complete by 12/01/04.

Prevention of Significant Deterioration corrections.

By: 3/4/04

Percent Complete  
50%

## Status:

OAQ is evaluating the impact of the various multipollutant proposals on Indiana air quality and sources. We provide input as requested and have strongly advocated passage of a multipollutant bill. The Clear Skies legislation may or may not move forward. In December, US EPA issued draft rules that would address reductions of mercury, NOx and SO2 from power plants. We submitted comments on March 30 on the Interstate Air Quality Rule and on June 29 on the proposed mercury rule.

**2.2.2.2.**

PPG (Y/N): Y

**Designation of Nonattainment areas under 8-hour ozone and fine particle standards**

EPA Role: Provide technical and legal assistance to IDEM as requested.

Conduct open process to inform and seek input from affected communities; submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA. Focus will be on Central Indiana.

By: 7/15/03 for ozone; 2/15/04 for PM2.5 or other date established by USEPA.

## Percent Complete

15%

## Status:

Central Indiana Air Quality/Advisory Group met May and July 2004. NW Indiana stakeholder group met in April, May, June, and July. Draft 2002 inventory complete. Modeling work underway.

**2.2.2.3.**

PPG (Y/N): Y

**Mid-Course Review of the One-Hour Ozone Attainment Demonstration for Lake and Porter Counties, Indiana**

EPA Role: Review and approve the submittal.

IDEM will reassess the modeling analyses and more recent monitoring and emissions data to determine whether the control strategy included in the Attainment Demonstration result in the level of emission reductions and air quality improvements needed to attain the ambient air quality standard for ozone.

Mid-course review:

By: 12/1/04

## Percent Complete

50%

## Status:

Modeling shows attainment. Collecting fiscal analysis information and finalizing rule language to reflect updated model inputs. Tentatively scheduled for preliminary adoption in October 2004.

**2.2.2.4.**

PPG (Y/N): Y

**Participate in national discussions on multi-pollutant legislation**

Participate in discussions on national multi-pollutant legislation; evaluate impacts (environmental and economic) of different strategies on Indiana; maintain dialogue with stakeholders within the state.

Ongoing

Percent Complete  
50%

Status:

An Energy Efficiency/Renewable Energy guidance manual and application forms have been prepared. No applications received in 2003. We have worked with Commerce to additional marketing materials to encourage applicants in 2004. A marketing plan for the Indiana Clean Energy Credit Program has been developed. A fact sheet has been developed and a brochure is being finalized. A "Clean Energy Credit Program" website has been created for guidance material, applications forms and information specific to EE/RE set-aside.

#### 2.2.2.5.

PPG (Y/N): Y

#### Planning Activities for 8-hour and fine particle ozone standard

EPA Role: Provide technical assistance and written guidance on inventory, modeling, requirements for State Implementation Plans, and other issues

Conduct inventory, modeling, and early planning activities for development of State Implementation Plans for Indiana's 8-hour ozone and PM<sub>2.5</sub> nonattainment areas. Work closely with Lake Michigan Air Directors Consortium and other Region 5 states.

Ongoing through 6/30/05

Percent Complete  
100%

Status:

OAQ has reviewed and accepted the 8th quarter report covering July, August, and September 2003. The report was presented to the Clean Manufacturing Technology (CMTI) Board on December 4, 2003, and completes CMTI's work under the contract. The written assessment and recommendations of the Memorandum of Agreement (MOA) were completed on December 24, 2003. IDEM signed a new MOA on December 15, 2003, to provide pollution prevention and technical assistance of small businesses.

#### 2.2.2.6.

PPG (Y/N): Y

#### Lake County SO<sub>2</sub> Redesignation Petition

EPA Role: Provide technical and legal assistance; review rule language in accordance with Indiana rulemaking schedule and provide input on draft redesignation petition.

Complete necessary rulemaking; prepare and submit to USEPA redesignation petition for Lake County SO<sub>2</sub>.

By: Complete rulemaking by June 2004;  
submit redesignation petition by 12/31/04

Percent Complete  
50%

Status:

Staff continue to discuss P2 with companies during their inspections. P2 is discussed at inspector staff meetings.

#### 2.2.2.7.

#### Implement Pollution Prevention Efforts

PPG (Y/N): N

Implement the Energy Efficiency/Renewable Energy program under the Indiana Nitrogen Oxides rule in cooperation with the Department of Commerce, Energy Policy Division, consistent with the Memorandum of Understanding.

By: Award allowances under Energy Efficiency/Renewable Energy program by 12/31/03 and 12/31/04

Percent Complete

50%

Status:

OAQ and the NWRO have discussed the oversight with each of the affected steel mills and U.S. EPA. OAQ and NWRO met with US Steel to discuss transition issues. Discussion with Citizens Gas has yet to be scheduled. A draft Request for Proposals and Letter of Intent is completed and is being routed for signature.

Oversee completion of Clean Materials Technology Institute contract to provide compliance assistance to small businesses and selected industry sectors. Complete a written assessment of the contract and make recommendations for future Technical Assistance Programs.

Ongoing oversight; written assessment of CMTI contract and recommendations completed by 12/31/03

Percent Complete

50%

Status:

Initial NOx allowance allocations have been completed and 2007-2009 EGU allocations have been sent to US EPA. NOx budget permit applications for new and existing sources have been received and permit language developed. Permit language is being included in pending permits and will be inserted in existing permits as significant source modifications. New source applications for 2004 have been reviewed and allowances calculated. Allowances for new units and the redistribution of unlocated allowances have been sent to US EPA. Early reduction credit applications have been reviewed and were sent to US EPA. New unit allowance applications for 2005 are beginning to be submitted.

Integrate Pollution Prevention into compliance activities.

Ongoing through 6/30/05

Percent Complete

50%

Status:

Staff continue to discuss P2 with companies during their inspections. P2 is discussed at inspector staff meetings.

#### 2.2.2.8. Coke Oven Compliance Oversight

PPG (Y/N): N

EPA Role: Support state efforts to transfer oversight of coke oven compliance program to IDEM from steel mills

Develop and implement a compliance program that provides IDEM oversight of contract for daily observations of coke ovens and Indiana facilities. This includes discussions with coke oven facilities, development of a contract for the program, selection of vendor(s), completion of the contract, establishment of a billing system and implementation and oversight of the contract activities.

By: 6/30/04

Percent Complete  
50%

Status:

OAQ and the NWRO have discussed the oversight with each of the affected steel mills and U.S. EPA. OAQ and NWRO met with US Steel to discuss transition issues. Discussion with Citizens Gas has yet to be scheduled. A draft Request for Proposals and Letter of Intent is completed and is being routed for signature.

#### 2.2.2.9. Implement Nitrogen Oxides Reduction Rule

PPG (Y/N): N

EPA Role: Administer regional trading program, provide guidance as needed.

Implement the provisions of the Indiana Nitrogen Oxides control rule, including management of allowances, compliance certification activities, distribution of new source and early reduction credits.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

Initial NOx allowance allocations have been completed and 2007-2009 EGU allocations have been sent to US EPA. NOx budget permit applications for new and existing sources have been received and permit language developed. Permit language is being included in pending permits and will be inserted in existing permits as significant source modifications. New source applications for 2004 have been reviewed and allowances calculated. Allowances for new units and the redistribution of unlocated allowances have been sent to US EPA. Early reduction credit applications have been reviewed and were sent to US EPA. New unit allowance applications for 2005 are beginning to be submitted.

#### 2.2.2.10. Undertake Projects to Assess and Reduce Risks Identified in IDEM's SEA 259 report

#### Diesel Emissions

- Investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

Percent Complete  
70%

Status:

Once State QPA is in place, we will be ready to move forward on several projects. IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, for \$250,000 to be used on Evansville and Indianapolis school buses. A new grant was filed on July 2, 2004 for the voluntary retrofit program.

- In partnership with OPA, work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

Percent Complete  
100%

Status:

On April 23 STAI with IDEM support voted to approve an Idling resolution to limit idling in up to 95% of the school systems in Indiana. Staff continue to work to encourage entities to opt-in to the idling policy adopted by the STAI.

- Working with the Office of Planning and Assessment, form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

Percent Complete  
85%

Status:

IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, for \$250,000, which will enable 100% of the Evansville school fleet to be retrofitted. Staff continue to work in cooperation with the Northwest Diesel Workgroup.

- Complete the Idleaire truckstop electrification project.

By: 6/30/04

Percent Complete  
60%

Status:

Total funding is secured. IdleAire and Pilot Truck Stops have executed their contract. We have developed the state contract with NIRPC and IdleAire as a sole-source vendor. DOA has approved IdleAire as a sole source vendor.

## Toxics Monitoring

- (a) Locate a Toxwatch monitor in Allen County

By: 9/1/03

Percent Complete  
100%

Status:

A ToxWatch monitor was installed in Allen County on 7/01/03. Data for this site are available on the ToxWatch web site.

(b) Perform air toxics monitoring, via grab samples or with a permanent monitoring site, depending on available funding, in Southwest Indianapolis as indicated by the SEA 259 report; perform a data analysis and draft report with recommendations for next steps.

By: 12/1/03

Percent Complete  
33%

Status:

Two of the six grab samples have been collected and the analysis has been performed on these samples.

(c) Perform metals analysis on PM10 filters and draft report with recommendations for next steps.

By: 2/1/04

Percent Complete  
100%

Status:

Analysis has been performed on archived filters and a report has been produced by the Air Toxic Section.

## 2.2.3. Compliance Branch

### 2.2.3.1.

PPG (Y/N): N

#### Inspect Air Sources for Compliance

Implement a strategic inspection plan that will include inspecting all sources responsible for 95% of the emissions statewide (excluding gas compressor stations).

Annually by June 30 each year

Percent Complete  
83%

Status:

The Compliance Branch and Regional Office inspectors have completed 59 of the 70 inspections in FY04 of sources that account for 95% of the emissions statewide. The number of completed inspections does not include all inspections of these sources conducted due to a lag in reporting time, including mail lag time between Regional Offices and our office.

Develop and implement the annual Compliance Monitoring Strategy for inspections and compliance evaluations, including the review of Part 70 Annual Compliance Certifications.

By: Develop the Compliance Monitoring Strategy annually by 9/30 each year and implement annually by June 30 each year

Percent Complete  
77%

**Status:**

The Compliance Monitoring Strategy for FY04 has been completed and submitted to U.S. EPA on September 29, 2003. The Compliance Branch and Regional Office inspectors have completed 121 of the 160 of the Part 70 CMS source inspections for FY04, and 40 of the 49 FESOP CMS source inspections for FY04 have been completed. The number of completed inspections does not include all inspections of these sources conducted due to a lag in reporting time, including mail lag time between Regional Offices and our office. Additionally, one (1) CMS inspection was not completed by the end of fiscal year '04. That was due to having to share one of our inspectors with the Permits Branch.

**2.2.3.2.****PPG (Y/N): N**

### **Compliance Program for Sources Subject to Leak Detection Requirements**

Implement coordinated Office of Air Quality/Office of Land Quality compliance program for inspection of sources subject to leak detection requirements. The compliance program will include (1) Office of Land Quality will provide Office of Air Quality with Leak Detection and Repair (LDAR) training on Method 21 testing equipment; (2) Office of Land Quality will accompany Office of Air Quality inspectors on at least one inspection each year and provide technical support on other inspections as requested.

By: (1) Provide training by 12/31/03; (2)  
Conduct at least one co-inspection by June  
30 of each year

Percent Complete  
50%

**Status:**

OLQ has developed the Method 21 Training Module and will present it to a group of inspectors on April 14, 2004. A joint inspection of Reclaimed Energy was performed on March 22, 2004..

**2.2.3.3.****PPG (Y/N): N**

### **Use Existing Databases to Prioritize Sources for Compliance Activities**

Identify and conduct compliance evaluations on sources where Toxic Release Inventory reports emissions above permitted limits.

By: Review TRI by December 31 of each  
year and inspect by June 30 of each year

Percent Complete  
50%

**Status:**

The TRI database information has been reviewed for FY 04. Two sources have been identified for investigation. Both investigations have been completed and one (1) violation was discovered (Seymour Manufacturing). The matter has been referred to the Office of Enforcement.

Review current Toxic Release Inventory to identify sources that emit one or more of the five highest reported chemicals and assure appropriate compliance attention.



By: Review Toxic Release Inventory by December 31 of each year and inspect by June 30 of each year

Percent Complete  
50%

Status:  
Staff are reviewing emission statements prior to conducting Compliance Monitoring Strategy inspections.

Review emission statements prior to conducting Compliance Monitoring Strategy inspections to identify significant increases in reported emissions.

Ongoing through 6/30/05

Percent Complete  
45%

Status:  
OAQ and Regional Office inspectors have received 287 complaints so far in FY04. Inspectors respond to complaints as they receive them.

#### **2.2.3.4. Respond to Complaints**

PPG (Y/N): N

Respond in timely fashion (no later than 30 days from receipt) to 100% of complaints.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
OAQ and Regional Office inspectors have received 287 complaints so far in FY04. Inspectors respond to complaints as they receive them.

#### **2.2.3.5. Coke Oven Compliance Oversight**

PPG (Y/N): N

EPA Role: Support state efforts to transfer oversight of coke oven compliance program to IDEM from coke plants.

Develop and implement a compliance program that provides IDEM oversight of contract for daily observations of coke ovens at Indiana facilities. This includes discussions with coke oven facilities, development of a contract for the program, selection of vendor(s), completion of the contract, establishment of a billing system and implementation and oversight of the contract activities.

By: 6/30/04

Percent Complete  
50%

Status:  
OAQ and the NWRO have discussed the oversight with each of the affected steel mills and U.S. EPA. OAQ and NWRO met with US Steel to discuss transition issues. Discussions with Citizens Gas has yet to be scheduled. A draft Request for Proposals and Letter of Intent is completed and is being routed for signature.

#### 2.2.3.6. Compliance Database

PPG (Y/N): N

As available resources allow, develop and begin implementation of a compliance database system that links many of the current Compliance Branch databases as well as other Office of Air Quality and agency databases, following all agency database criteria and assuring compatibility with USEPA compliance data reporting requirements.

By: 6/30/05

Percent Complete  
50%

Status:

The contract was signed and executed on June 24, 2004. Haverstick Consulting began work on July 2, 2004. The anticipated completion date is August 12, 2005.

#### 2.2.3.7. Implement Asbestos/Lead Licensing Program

PPG (Y/N): Y

Issue 75% of asbestos/lead licenses within 14 days of receipt and 100% within 21 days of receipt.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

During the time period from July 1, 2003, through June 30, 2004, 2650 asbestos licenses were issued, of which 80% issued an approval/denial within 14 days, and 100% were issued an approval/denial within 21 days. 240 lead licenses were issued, during the time period from July 1, 2003, through June 30, 2004, of which 85% were issued an approval/denial within 14 days, and 100% were issued an approval/denial within 21 days.

Implement bilingual program, including approval and audit of Spanish language training courses, translation of materials, and customer assistance.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

Initial contract for Spanish training course provider audits was approved in November 2002 and has been renewed and active until June 9, 2006. During the time period of July 1, 2003, through June 30, 2004, no bilingual on-site audits were conducted. During this time period the Language Training Center, IDEM's foreign language contractor, provided a complete desk audit of one training course provider whom has applied for approval of their Spanish worker initial and refresher course. These courses were found to be incomplete thus denied. Barbara Gordon serves as interpreter for the Asbestos/Lead Section and translates forms on daily basis as needed. We have changed the front desk duties to allow Barbara to serve as interpreter for entire office.

Issue approval/disapproval of 95% of training course provider applications within 30 days and 100% within 90 days.

Annually June 30 of each year

Percent Complete  
50%

Status:

During the time period of July 1 through June 30, 2004, 104 (95%) asbestos training course applications were received and issued within the 30 day time frame, with 104 courses (100%) being issued within the 90 day time frame. During this same time period, 39 (81%) lead training course applications received were issued within the 30 day time period and 48 (100%) issued within the 90 day time frame.

Audit 10% of asbestos and lead training courses.

Annually June 30 of each year

Percent Complete  
50%

Status:

11 asbestos (8%) and 2 lead audit (5%) were conducted during the time period of July 1, 2003, through June 30, 2004. Due to changes within the Branch and the Asbestos/Lead Section, Staff time was required to be reallocated during this time period.

Monthly post a list of current asbestos and lead-based paint licensees on the IDEM website.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

This process has slowed down during the time period of July , 2003, through June 30, 2004, due to the current upgrades of the asbestos/lead computer software. Currently program software is not compatible with pdf formatting software and all data must be converted into appropriate formatting by IT personnel prior to being placed on the website. It is anticipated that the program will be up and functional by December 31, 2004.

#### 2.2.3.8.

#### Asbestos/Lead Compliance Activities

PPG (Y/N): Y

- (1) Inspect 95% of the licensed asbestos/lead contractors that submit notifications annually.
- (2) Review building records from 10 cities or towns to identify demolitions/renovation projects that did not provide asbestos notifications and take appropriate action.
- (3) Inspect 20% of all asbestos notifications received and 90% of all lead-based paint notifications received.
- (4) Audit the risk assessments of at least 15% of those licensed as lead-based paint Risk Assessors.
- (5) Respond to asbestos and lead-based paint abatement complaints no later than the next working day; respond to other complaints within 14 days.

Annually by June 30 of each year

Percent Complete  
50%

Status:

1) All licensed asbestos/lead contractors that submit notifications have been inspected.

2) Building records were reviewed for 11 cities/towns that issue building/demolition permits. An additional 16 cities/towns were visited which either did not issue permits, could not provide a list of demolition permits, or in one case would not provide a list. Information on asbestos demolition notification requirements was provided to all building commissions visited to educate them. Of the records reviewed, at least 4 incidents of failure to notify were identified; violation letters are sent to the responsible parties in those cases.

3) At least 20.5% of Asbestos notifications received were inspected (2089 asbestos notifications received, 429 inspections conducted; local agency numbers are not fully accounted for yet). 75% of lead notifications were inspected (8 lead notifications received, 6 inspections conducted; all lead notifications have been inspected since November 30, 2003).

4) Reports of 15% of licensed risk assessors were reviewed (34 individuals' risk assessments reviewed out of 226 licensed persons). 88% of the audited risk assessments were found to be deficient in some way. Letters noting the findings of the audit are being sent to all licensed assessors. Appropriate outreach beyond the letters is being considered to improve the reporting of future assessments.

5) Ongoing. All complaints are responded to on average within 1 day. 30 complaints were received and respond to between July 1, 2003, through June 30, 2004.

#### 2.2.3.9.

#### Asbestos/Lead Special Projects

PPG (Y/N): Y

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

Percent Complete

Development of informational materials 100% Complete; implementation is on-going.

Status:

OAQ continues to work with these contractors. Fact Sheet for asbestos renovation/demolition contractors developed and being posted on website. Fact Sheet and Mercury Awareness Program pamphlet identifying mercury containing items to be given out by field inspectors during on-site inspections. Will consider other outreach strategies such as holding a public meeting for asbestos renovation/demolition contractors to educate them on mercury switch removal. Indianapolis OES added a similar provision in their contract with IDEM to provide outreach to asbestos renovation/demolition contractors.

Assist Office of Planning and Assessment in administering lead mini-grants, when money is available, to Indiana Health Departments and CAP agencies.

Ongoing

Percent Complete  
100%

**Status:**

Project completed as of 9/30/03. Mini-grants were awarded as follows:

1. Marion County Health Department \$10,000 award, in April 2003.
2. Wayne County Health Department \$5,000 award, in April 2003.
3. City of Hammond \$5,000 award, in May 2003.
4. St. Joseph County Health Department \$5,000 award, in May 2003.
5. Allen County Health Department \$5,000 award, in May 2003.

All mini-grants were completed in by September 30, 2003. IDEM currently has a grant request pending at Region 5 headquarters for the FY04 grant period, which includes additional mini-grant funds.

Convert existing Licensing and Tracking databases from Paradox based system to Oracle.

By: 6/30/04

Percent Complete  
90%

**Status:**

The asbestos/lead training course provider database has been converted from Paradox, as well as the lead licensing and third-party exam databases. We are currently in the process of finishing the asbestos licensing and notification databases. The new program has been developed and conversion from Paradox to the new system has been completed; however, minor problems arising during initial usage (which will occur over the next year) continue to be worked out on as needed basis.

**2.2.3.10.**

PPG (Y/N): N

**Compliance Test Review Activities**

Approve protocols within 10-15 days prior to tests, quality assure and validate compliance tests focusing on Title V and Federally Enforceable State Operating Permit sources, sources in nonattainment areas, sources subject to state and federal air toxics rules, sources subject to enforcement orders, and sources seeking to establish alternate emission factors. Observe 75% of tests and review 100% of test reports.

Ongoing through 6/30/05

Percent Complete  
47%

**Status:**

Staff are focusing on priorities, as stated above, and are approving protocols in a timely manner. 83% (391 of 471) of the protocols have been reviewed and 45% (212 of the 471) of the tests have been observed. 48% (435 of 907) of the test reports were reviewed. There is currently a backlog of test reports to be reviewed and a strategy is being developed to deal with this backlog. Additional resources have been devoted to this task.

**2.2.3.11.**

PPG (Y/N): N

**Continuous Emissions Monitor Activities**

Certify continuous emissions monitoring systems and quality assure 50% of tests (observe 10% of field tests). Review 100% of the Relative Accuracy and Test Audits (RATA).

Ongoing through 6/30/05

Percent Complete  
45%

Status:  
45% (154 of 558) of field tests were observed for FY04. 27% (135 of 501) monitors have been reviewed. There is currently a backlog of reports to be reviewed and a strategy is being developed to deal with this backlog.

#### 2.2.4. Permits Branch

##### 2.2.4.1. Issue Title V permits

PPG (Y/N): N

EPA Role: Help address permits where federal enforcement actions are pending; provide guidance on compliance monitoring and other permit content issues.

Issue all Title V permits to sources whose applications were submitted prior to June 30, 2001.

By: 80% issued by 6/30/03; 85% issued by 8/31/03; 90% issued by 10/31/03; 100% issued by 12/31/03

Percent Complete  
90.5%

Status:  
Issued: 716 Pending: 75, of which 42 have been to Public Notice.

##### 2.2.4.2. Issue timely permit decisions

PPG (Y/N): N

Meet all mandated permit deadlines 100% of the time, without sacrificing permit quality or opportunities for public input.

By: 6/30/05

Percent Complete  
50%

Status:  
No late permits this quarter.

##### 2.2.4.3. Issue all Title V and Federally Enforceable State Operating Permit Renewals

PPG (Y/N): N

Issue renewals of all Title V and Federally Enforceable State Operating (FESOP) permits according to regulatory timeframes.

By: 6/30/05

Percent Complete  
77.2% FESOP renewals as of July 1, 2004.

17.4% TVOP renewals as of July 1, 2004.

Status:  
See above percentages.

#### 2.2.4.4.

PPG (Y/N): N

#### Implement Section 112(j) Maximum Achievable Control Technology Hammer Provisions

EPA Role: Act as a clearinghouse for information collected and analyzed by EPA for Section 112(d) NESHAP development to assist IDEM's determination of Section 112(j) MACT.

- (1) Continue outreach efforts by maintaining up-to-date information on EPA's promulgation of Section 112(d) National Emission Standards for Hazardous Air Pollutants (NESHAPs).
- (2) Implement Section 112(j) by making applicability determinations of requests already received, notifying Part I applicants of their status within 10 days of the applicable Part 2 application deadlines, acting on new or resubmitted requests for applicability determinations within 120 days of the effective date of the new section 112(j) rule, and acting on Part 2 applications by issuing a permit modification approval containing Maximum Achievable Control Technology (MACT) requirements within 18 months of receipt of a complete application, unless EPA has promulgated an effective Section 112(d) National Emission Standards for Hazardous Air Pollutants (NESHAPs) by then.

Ongoing through 6/30/05

Percent Complete  
60%

Status:  
We continue to review and issue applicability determinations (32% issued, 92% drafted) and maintain the website with updated information on EPA's promulgation of Section 112(d) NESHAPs. Some determinations are being held back pending an official publication date for some of the Section 112(d) NESHAPs. No Part 2 applications are due at this time.

#### 2.2.4.5.

PPG (Y/N): N

#### Enhance Public Participation in Permit Process

EPA Role: Participate in public education sessions, based on interest and available resources.

Conduct outreach and training sessions in four or more Indiana regions on general air issues and on the permitting process.

By: Outreach sessions completed by 7/31/03

Percent Complete  
50%

Status:  
Lafayette and Northwest Indiana completed. Evaluating usefulness of similar sessions in Evansville and Fort Wayne.

Conduct public meetings (prior to formal public hearing) on draft Title V permits of particular public interest.

By: public meetings scheduled based on interest, but to be completed in the 8-9/30/03 timeframe

Percent Complete  
50%

Status:  
Hearing/Meetings conducted:

Amrox in Porter County - February 24, 2004; A.E. Staley/Lafayette AQ issues - March 8, 2004; GPC, Washington, March 23, 2004; AK Steel Rockport, March 30, 2004. Meetings/hearings were held for Bucko in Gary during April and Citizens Gas in Indianapolis the week of May 3. Other potential hearings/meetings Clifty Creek in Madison.

Provide additional assistance on particularly lengthy or complex permits, or permits of particular public interest (e.g. steel mills, chemical plants).

By: Public hearings held in September-October 2003 timeframe

Percent Complete  
50%.

Status:  
Providing 60-day notice and giving a personal "heads up" note, with a full copy of the draft permit, to those who have expressed interest. Draft copies of steel mill and other high interest permits are available at multiple locations in Northwest Indiana. Providing "date certain" for end date of comment period in public notice.

#### 2.2.4.6.

PPG (Y/N): N

#### **Complete rulemakings to implement federal new source review reform and maintain federal approval of major source permitting program**

Complete rulemaking to implement provisions of federal new source review rules.

By: First Notice published by 4/1/03; Second Notice published by 9/1/03; Preliminary adoption in February 2004; Final adoption in 8/31/04;

Percent Complete  
99%

Status:  
Rule final adopted by the air board on June 2, 2004. Promulgation packet forwarded to the Attorney General's Office with a request for expedited review on July 5, 2004. Parallel processing request submitted to U.S. EPA, Region 5, on March 22, 2004; a final supplement to the parallel processing request will be made to U.S. EPA as soon as the rule prints as final in the Indiana Register.

Complete rulemaking to address deficiencies noted in EPA's conditional approval of Indiana's Prevention of Significant Deterioration program.

By: 3/3/04, including preliminary adoption by 9/30/03 and final adoption by 12/31/03

Percent Complete  
100%

Status:  
Approval of final rule as a SIP revision. Effective July 19, 2004. 69 FR 29071 (May 20, 2004).



## 2.2.5. Programs Branch

### 2.2.5.1. Designation of Nonattainment areas under 8-hour ozone and fine particle standards

PPG (Y/N): Y

Conduct open process to inform and seek input from affected communities; submit recommendations for attainment/nonattainment designations under 8-hour ozone and fine particle standards to USEPA.

Ozone

By: 7/15/03

Percent Complete  
100%

Status:  
U.S. EPA published final designations April 15, 2004.

PM2.5

By: 2/15/04 (or other date established by  
USEPA)

Percent Complete  
100%

Status:  
We submitted recommendations to US EPA on February 15, 2004.

### 2.2.5.2. Planning Activities for 8-hour ozone standard

PPG (Y/N): Y

Conduct inventory, modeling and early planning activities for development of State Implementation Plans for Indiana's 8-hour ozone nonattainment areas. Review and comment on USEPA draft implementation guidance. Work closely with Lake Michigan Air Directors Consortium and other Region 5 states.

Preliminary baseline sensitivity modeling.

By: 10/31/03

Percent Complete  
40%

Status:  
Ongoing. Currently running basecase for 2002. These runs do not constitute attainment demonstration. Revised emission files being constructed and QA'd. Attainment guidance may be available this summer.

Final 2002 baseline inventory.

By: 10/31/04

Percent Complete  
70%

Status:  
Point source inventory complete, beginning area sources.

Regulatory case strategy modeling.

Ongoing through 6/30/05

Percent Complete  
0%  
Status:  
Strategy modeling has not yet begun.

### 2.2.5.3. Planning Activities for Fine Particle Standard

PPG (Y/N): Y

Conduct inventory, modeling and early planning activities for development of State Implementation Plans for Indiana's fine particle nonattainment areas. Conduct analysis of first three full years of PM<sub>2.5</sub> monitoring data. Review and comment on USEPA draft implementation guidance. Work closely with Midwest Regional Planning Organization and other Region 5 states. Assess current status of controls on utility units and the impacts of those uncontrolled by scrubbers and NO<sub>x</sub> controls; issue report.

Complete analysis of first three years of monitoring data.

By: 6/30/03

Percent Complete  
100%  
Status:  
Analysis complete from 2000 through second quarter of 2003.

Develop utility control report.

By: 12/31/04

Percent Complete  
100%  
Status:  
Database of all controls constructed.

Develop PM<sub>2.5</sub> inventory for 2002.

By: 6/30/05

Percent Complete  
70%  
Status:  
PM<sub>2.5</sub> data with generalized emission factors have been loaded into STEPS database. Work being performed concurrently with ozone inventory.

Modeling and data analysis.

Ongoing through 6/30/05

Percent Complete  
75%

Status:  
Participating in LADCO/RPO committee meetings. Basecase modeling complete.  
Completed PM Coarse analysis for all Midwest RPO states.

#### **2.2.5.4. Lake County SO2 Redesignation Petition**

PPG (Y/N): Y

Complete necessary rulemaking; prepare and submit to USEPA redesignation petition for Lake County SO2.

Complete rulemaking.

By: 6/30/04

Percent Complete  
50%

Status:  
Modeling shows attainment. Collecting fiscal analysis information and finalizing rule language to reflect updated model inputs. Tentatively scheduled for preliminary adoption in October 2004.

Submit redesignation petition.

By: 12/31/04

Percent Complete  
10%

Status:  
Some background work completed. Dependent on final modeling and rulemaking to complete.

#### **2.2.5.5. Participate in national discussions on multipollutant legislation**

PPG (Y/N): Y

Participate in discussions on multipollutant legislation; evaluate impacts (environmental and economic) of different strategies on Indiana; maintain dialogue with stakeholders within the state.

By: 6/30/05

Percent Complete  
50%

Status:  
OAQ is evaluating the impact of the various multipollutant proposals on Indiana air quality and sources. We provide input as requested and have strongly advocated passage of a multipollutant bill. The Clear Skies legislation may or may not move forward. In December US EPA issued draft rules that would address reductions of mercury, NOx and SO2 from power plants. We submitted comments on March 30 on the Interstate Air Quality Rule and on June 29 on the proposed mercury rule.

#### **2.2.5.6. Nitrogen Oxides Rulemaking, Phase II**

PPG (Y/N): N

EPA Role: Issue Phase II NO<sub>x</sub> rule, provide guidance to states for implementation into state plans

Undertake rulemaking to implement US EPA's Phase II NO<sub>x</sub> control rule.

By: Schedule will be established when EPA issues its rule.

Percent Complete  
10%

Status:  
Final rule issued in May 2004. Internal workgroup established.

#### **2.2.5.7. Regional Haze**

PPG (Y/N): Y

EPA Role: Provide implementation guidance for Best Available Retrofit Technology and Regional Haze Implementation Plan development

Prepare inventory of Indiana sources subject to Best Available Retrofit Technology requirement under Regional Haze program.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
Updated inventory and sent to LADCO. Comments on BART rule sent to EPA July 15, 2004.

#### **2.2.5.8. School 21 Air Toxics Assessment Project**

PPG (Y/N): Y

EPA Role: Assist with oversight of federal grant, provide technical assistance on risk characterization activities and interpretation of monitoring data.

Perform air risk characterization, additional monitoring, and support other grant activities. Issue final report.

By: 8/30/04

Percent Complete  
60%

Status:  
The audit of Citizens Gas commenced with a site visit in June 2004. Risk characterization is progressing and initial model runs have begun. Monitoring activities continue. Report will not be final until the end of 2004.

#### **2.2.5.9. Mercury Deposition Monitoring Project**

PPG (Y/N): N

Continue implementation of mercury deposition monitoring project and complete data analysis in cooperation with the United States Geological Survey. Issue final report.

By: 6/30/05

Percent Complete  
70%

Status:  
Monitoring is ongoing for both wet and dry deposition of mercury and trace metals.  
Data analysis continues for mercury events that are considered large when compared to other sites and seasons in the database.

#### **2.2.5.10. Electric Arc Furnace Assessment, Phase II**

PPG (Y/N): N

EPA Role: Provide technical assistance

Develop scope of study to create an emissions profile and perform air risk characterization for an Indiana electric arc furnace.

By: 9/30/03

Percent Complete  
70%

Status:  
Initial report completed in May 2004, and was used to develop the scope for Phase II.  
Phase II is underway.

Issue final report.

By: 6/30/04

Percent Complete  
0%

Status:  
The second phase will begin once the scope of work is finalized.

#### **2.2.5.11. Air Toxics Inventory**

PPG (Y/N): Y

Complete 2001 Great Lakes Air Toxics Inventory (Regional Air Pollutant Inventory Development System (RAPIDS))

By: 9/30/03

Percent Complete  
75%

Status:  
2001 point and area source updates submitted for regional QA.

#### **2.2.5.12. Emissions Reporting Rule**

PPG (Y/N): N

EPA Role: Provide input on draft rule language as requested and guidance on emissions reporting for PM<sub>2.5</sub>

Complete current rulemaking.

By: 12/31/03

Percent Complete  
100%

Status:  
Final rule effective March 27, 2004.

Initiate and complete rulemaking to add reporting of ammonia and PM<sub>2.5</sub>, per US EPA's Combined Emissions Reporting Rule.

By: Publish First Notice of Rulemaking by 3/1/04; preliminary adoption by 9/30/04; final adoption by February 2005

Percent Complete  
10%

Status:  
First notice in review.

#### 2.2.5.13.

PPG (Y/N): Y

#### Obtain EPA Approval of Outstanding Rule and Plan Submittals

EPA Role: provide timely comment and identify approvability issues at an early stage in the process; review and act on submittals.

Work with USEPA to gain approval of the following pending rule or plan submittals: Process weight rate; changes to 326 IAC 4-2 and 9-1; Secondary lead smelters; Commercial and industrial waste incinerators plan submittal; changes to 326 IAC 8-2-9 and 13-3-1 (Clark and Floyd redesignation); Lilly Reasonably Available Control Technology (RACT) plan; Canam Steel RACT plan; Transwheel RACT plan; Crane #2; Prevention of Significant Deterioration (PSD) Corrections; NO<sub>x</sub> Corrections; New Source Review (NSR) Reform Plan submittal; Lake County SO<sub>2</sub> rule; US Steel PM<sub>10</sub> revisions.

By: 6/30/05

Percent Complete  
43%

Status:  
Process weight rate \_\_\_\_\_; Changes to 326 IAC 4-2 and 9-1 \_\_\_\_\_;  
Secondary lead smelters \_\_\_\_\_; Commercial and industrial waste incinerators plan submittal: 6/16/03 (68 FR 35181); changes to 326 IAC 8-2-9 and 13-3-1 (Clark and Floyd Counties redesignation) 9/19/03 (68 FR 42978); Lilly RACT plan \_\_\_\_\_; Canam Steel RACT plan - withdrawal of request. Plant closed and vacated. Transwheel RACT plan \_\_\_\_\_; Crane #2 \_\_\_\_\_; PSD corrections 05/20/04. Direct final. 69 FR 29071. NO<sub>x</sub> corrections 12/11/03 (68 FR 69025); NSR Reform Plan submittal \_\_\_\_\_; Lake County SO<sub>2</sub>: \_\_\_\_\_ US Steel PM<sub>10</sub> revisions 3/22/04. Direct final ((69 FR 13221).

#### 2.2.5.14.

PPG (Y/N): Y

#### Emissions Statements/2002 Baseline Inventory

Enter data into the Satellite i-STEPS software program and send Quality Assurance reports to companies.

By: 9/30/03

Percent Complete  
100%

Status:  
Task completed.

Finish compilation of data into the Satellite i-STEPS software program and prepare billing file.

By: 12/31/03

Percent Complete  
100%  
  
Status:  
Task completed.

Add area source data and submit 2002 data to EPA National Emissions Inventory version 1.

By: 6/30/04

Percent Complete  
100%  
  
Status:  
Task completed.

#### **2.2.5.15. Toxwatch Analysis**

PPG (Y/N): Y

Develop screening mechanism for regular review and flagging of HAP air quality data of concern and protocol for addressing it.

By: 12/31/03

Percent Complete  
100%  
  
Status:  
Screening values and query program developed. Screening begun in spring 2004.

Analyze Toxwatch data from 1999 through 2004 and issue report.

By: 6/30/05

Percent Complete  
10%  
  
Status:  
Data have been quality assured to-date. Task is ongoing.

#### **2.2.6. Air Monitoring Branch**

##### **2.2.6.1. Ambient Air Quality Monitoring**

PPG (Y/N): Y

EPA Role: Monitoring guidance, funding oversight

Maintain Indiana's ambient air monitoring network for criteria pollutants, meeting data completeness goal of 90%.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

Valid data returns from the individual parameters for July 2003 - June 2004 are: SO<sub>2</sub> - 94%, CO - 91%, O<sub>3</sub> - 97%, NO<sub>x</sub> - 95%, PM<sub>10</sub> (cont) - 96%, PM<sub>2.5</sub> (cont) - 96%, PM<sub>10</sub> (int) (July-Mar - 84%, Lead (Jul-Mar) - 94%, PM<sub>2.5</sub> (int) - \*Jul-Mar) - 94%.

#### 2.2.6.2.

##### Fine Particle Monitoring

PPG (Y/N): Y

EPA Role: Monitoring and Network Guidance, Grant oversight

Establish continuous fine particle monitors at 8 additional sites.

Deploy 5 sites by 12/31/03; deploy 3 sites by 12/31/04

Percent Complete  
55%

Status:

Terre Haute began operation in August 2003. New Albany, Ogden Dunes, and Hammond Purdue began operation in November 2003. Requisitions for the Lafayette site are being prepared. Survey work has begun in the Bloomington area.

#### 2.2.6.3.

##### Monitor for Air Toxics

PPG (Y/N): Y

EPA Role: Provide funding and risk assessment guidance

Operate basic canister-based air toxics monitoring program at eight sites in Indiana.

By: Ongoing through 6/30/05

Percent Complete  
50%

Status:

Monitoring is conducted at School 21, Evansville, Elkhart, Fort Wayne, Indianapolis, Ogden Dunes, Gary IITRI, EC Water, and Hammond CAAP.

Publish toxics monitoring data on IDEM webpage quarterly.

Quarterly, through 6/30/05

Percent Complete  
50%

Status:

The most current toxics data posted on the TOXWATCH website are 1st quarter 2004.

#### 2.2.6.4.

##### Monitor for Air Toxics at School 21 in Indianapolis

PPG (Y/N): Y

EPA Role: Provide funding through Air Toxics grant and risk assessment guidance.

Operate toxics canister sampler.

By: Ongoing through 5/15/04



Percent Complete  
100%

Status:

The monitoring at School -21 will continue through the end of this calendar year. The original proposed was to monitor till May 2004. Canister sampler is collecting samples every 6th day and on PAH sample days.

Conduct auto gas chromatography monitoring for 56 compounds.

By: Ongoing through 5/15/04

Percent Complete  
100%

Status:

Continuous monitoring for nine HAP's will continue for the remainder of this year using Perkin Elmer AutoGC system. All continuous data are uploaded on to the agency's Toxwatch webpage in a timely manner.

Conduct monitoring for polycyclic aromatic hydrocarbons for 10 episodic samples.

By: Ongoing through 5/15/04

Percent Complete  
70%

Status:

Ongoing.

Conduct meteorological monitoring.

By: Ongoing through 5/15/04

Percent Complete  
100%

Status:

Ongoing.

Prepare final report on monitoring program.

By: 8/31/04

Percent Complete  
10%

Status:

Data are analyzed as they are collected. Report will be prepared once monitoring is complete.

#### 2.2.6.5.

#### Conduct Fine Particle Speciation Monitoring

PPG (Y/N): Y

EPA Role: Monitoring guidance, coordination of final report on beta testing

Complete beta testing of speciation equipment and submit final report.

By: 12/31/03

Percent Complete  
85%

Status:

Sunset monitors are being deployed at Arizona, Illinois, and Washington and will operate with the R&P unit for about one quarter. Testing of the R&P carbon monitor at Indianapolis will continue through the 3rd quarter of 2004. A Sunset monitor will then be deployed in the 4th quarter of 2004.

The nitrate monitor is at R&P for upgrade of the NOX detector. This may help the comparison with the nitrate filters.

Problems with the sulfate monitor will then be addressed.

Establish one additional continuous speciation site if the testing is successful.

By: 12/31/04

Percent Complete  
0%

Status:

The testing of the continuous speciation instrumentation is still being conducted.

Conduct filter-based speciated monitoring at seven (7) sites.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

All seven sites are operational. South Bend and Hammond Purdue began operation on January 1, 2004.

#### 2.2.6.6.

#### Establish Aethalometer Monitor for elemental and organic carbon monitoring

PPG (Y/N): Y

EPA Role: Monitoring and data analysis guidance

Establish and operate Aethalometer monitor at Washington Park monitoring site. Evaluate as alternative method for continuous carbon monitoring.

Establish by 10/1/03, operate through  
6/30/05

Percent Complete  
50%

Status:

The aethalometer was deployed at Washington Park in September 2003. The data are being compared to the filter based on carbon values.

#### 2.2.6.7.

#### Operate Visibility Monitor

PPG (Y/N): Y

EPA Role: Provide guidance to maintain consistency with other National Hazecam network monitors.

Operate visibility monitor and provide data to regional Hazecam network. Provide ozone and PM2.5 data to the Hazecam site to provide correlation with impaired visibility.

By: Ongoing through June 30, 2005

Percent Complete

50%

Status:

Site is operational and pictures and data are posted to the Midwest Hazecam website.

#### 2.2.6.8.

PPG (Y/N): Y

#### Operate PAMS monitoring site and analyze data

EPA Role: Monitoring guidance

Operate the PAMS site in Northwest Indiana for hourly ozone, carbonyl, NO<sub>x</sub>, NO<sub>y</sub>, and meteorological information. Coordinate with USEPA and other Region 5 states on operation and quality assurance.

Ongoing through 6/30/05

Percent Complete

50%.

Status:

PAMS monitoring is completed for the 2003. PAMS monitoring for 2004 started on June 1, 2004, and is progressing according to schedule. Daily data processing and AIRS formatting is going according to the plan. PAMS monitoring will conclude at the end of August 2004.

#### 2.2.6.9.

PPG (Y/N): Y

#### Conduct Special Purpose Monitoring

Establish and operate PM-10 site at industrial-oriented site. Submit report on monitoring project.

Establish by 10/1/03; operate through 9/30/04; submit report by 12/31/04

Percent Complete

80%

Status:

Monitoring site was established near Jeffboat in Jeffersonville on September 25, 2003. Due to the property on which the site resides being sold, the study will end on July 13, 2004. No standards' violations have been recorded. The highest 24 hour value reported has been 81 ug/m3.

Identify location for special purpose monitoring in FY05.

By: 6/30/04

Percent Complete

100%

Status:

A monitoring site near ESSROC in Speed is planned to begin operation January 1, 2005.

#### 2.2.6.10. Confined Animal Feeding Monitoring Project

PPG (Y/N): N

EPA Role: Assist with identification of available funding

Work with Purdue and volunteer Confined Animal Feeding Operation (CAFO) (Rose Acres) on monitoring study to measure levels of ammonia, hydrogen sulfide, and fine particulate. Project dependent on obtaining funding.

By: Completion date dependent on timing and availability of funds.

Percent Complete  
0%

Status:  
No activity this quarter.

#### 2.2.6.11. Regional Monitoring Strategy

PPG (Y/N): Y

EPA Role: Approval of strategy, revision of federal monitoring requirements as necessary, approval of strategy and proposed networks.

Propose and implement revised monitoring networks in accordance with the Regional and National Monitoring Strategies (when finalized), and the needs of Indiana's ambient monitoring program for criteria pollutants and implement revisions upon approval by USEPA.

Submit recommended network

By: 9/30/03

Percent Complete  
100%

Status:  
The Regional Monitoring Strategy was submitted by the LADCO states to Region 5 in April 2004.

Implement revisions

By: 6/30/04 (date contingent upon USEPA approval)

Percent Complete  
25%

Status:  
Four PM2.5 continuous monitors installed; Perry County O3 is ready to begin operation on April 1, 2004. Dunes National Lakeshore and Lowell O3 were discontinued. Lafayette continuous PM2.5 is being prepared for instrumentation. Site survey work has begun for Bloomington.

#### 2.2.6.12. Provide Monitoring Data as needed for Attainment/Nonattainment Classifications

PPG (Y/N): Y

Provide final, quality assured data for the 2003 and 2004 ozone seasons.

By: As early as possible but no later than November 15 for 2003 and by November 15 for 2004 for ozone season data

Percent Complete  
100% complete for 2003, 25% complete for 2004

Status:  
All ozone data for 2003 have been quality assured and entered into AQS. Parts of April and May 2004 data have been quality assured.

Provide final, quality assured data for PM2.5.

By: March 31 of the following year.

Percent Complete  
100% complete for 2003, 25% complete for 2004.

Status:  
All PM2.5 data from 2003 were validated by February 2, 2004. First quarter 2004 data has been QA'd and are ready for entry into AQS.

#### 2.2.6.13.

PPG (Y/N): Y

#### Provide Timely and High Quality Information on Air Quality to the Public

Improve data quality handling operations to provide more complete and accurate ambient air quality data by implementing the Leading Environmental Analysis and Display System (LEADS®) system.

Complete deployment in two regional areas (Fort Wayne and Northwest Indiana) and new data website online.

By: 6/30/04

Percent Complete  
10%

Status:  
Staff are working with IPS MeteoStar and IT to prepare the contract for purchase and implementation of the project.

All additional continuous monitoring sites.

By: 6/30/05

Percent Complete  
0%

Status:  
System is not in place yet.

Produce daily and hourly ozone and PM2.5 data and maps to be posted on the internet through the regional mapping project, AIRNow.

Hourly through 6/30/05

Percent Complete  
50%

Status:  
Ozone maps were posted for July - September 2003. Ozone maps have been posted for April through current date for 2004. Beginning in October 2003, PM2.5 data have been uploaded hourly to AIRNow for input into the PM2.5 maps.

Update Toxwatch page.

Monthly through 6/30/05

Percent Complete  
50%

Status:  
Most current data on the Toxwatch page are 1st quarter 2004.

Provide data from all continuously monitored parameters in a timely and accurate manner via the Office of Air Quality Ambient Air Quality website.

Hourly through 6/30/05

Percent Complete  
50%

Status:  
All continuous data being produced are posted to the web within an hour after being collected in the field.

## 2.2.7. Office Support

### 2.2.7.1.

#### Manage Air Grants

PPG (Y/N): Y

EPA Role: Coordinate with IDEM staff on grant applications and submittals

Work with program staff, Office of Management and Budget Administration and EPA grant coordinators to ensure timely and accurate submittal of federal grants, grant extensions, amendments and revisions.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
All grant activities to date have been completed in a timely manner.

### 2.2.7.2.

#### Administer BP Amoco Fine Money Projects

PPG (Y/N): N

Develop and oversee contracts or other mechanisms for project proponents to implement projects funded by BP Amoco fine money.

Ongoing through term of individual grant.

Percent Complete  
40%

Status:  
4 of the projects have been funded. Currently negotiating contract terms for 3 others and details are still being decided for remaining 2 projects.

Develop grant process and conduct second round of project solicitation and awards.

By: 6/30/05

Percent Complete  
0%

Status:  
Not yet started.

### 2.2.7.3.

#### Quality Management Plan

PPG (Y/N): Y

Identify all current operating procedures and quality assurance documents to IDEM QA manager.

By: 12/31/03

Percent Complete  
75%

Status:  
Identification and organization of the documents has been done in some areas, but the list is not incorporated into the IDEM QMP database. A schedule for incorporation of the information into the database has not yet been set by QMP workgroup.

Review Office of Air Quality portions of the Quality Management Plan and identify any outstanding procedures or documentation. Consider needs for additions to Quality Management Plan. Prioritize outstanding commitments and/or additional needs and establish schedule for completion. Implement schedule.

Review and establishment of prioritized schedule.

By: 12/31/03

Percent Complete  
75%

Status:  
The QMP has been reviewed for identification of key OAQ components, and updates have been submitted to the QMP manager for incorporation into the revised QMP. QMP revision is pending and projected completion date has been moved from April 30, 2004, to December 2004.

## 2.3. Office of Legislative and Business Relations

The Office of Legislative and Business Relations (OLBR) serves as a liaison to the Indiana General Assembly and assists the 150 state legislators and their constituents. In addition, OLBR serves members of Indiana's business community both large and small.

The Office of Legislative Relations responds to hundreds of constituent requests. A wide range of constituent cases included anything from checking on the status of a wastewater permit, State Revolving Loan application or a Title V Permit to helping set up meetings for small communities to discuss enforcement actions.

The Office of Business Relations, is governed by IC 13-28-3-4, assists the business community with specific matters pending before the agency including status of permit applications, enforcement issues, and any business-related customer service issues. The office listens to the concerns of the business community, investigates and facilitates the proper resolution of issues.

### Office Contact(s):

Tonya Galbraith  
Director  
Office of Legislative and Business Relations  
(317) 232-8598  
e-mail: tgalbrai@dem.state.in.us

### 2.3.1. Agency Priorities

#### 2.3.1.1. Building better relationships with the Indiana General Assembly

Plan at least 10 educational visits with legislators in their districts. This outreach will include touring wetlands, agricultural operations, wastewater treatment facilities and other environmental-related programs district.

Meet with at least 50% of the committee members of the House and Senate Environment Committees in their district, and visit a priority environmental concern or success in their district.

Plan an educational forum as part of the Environmental Quality Service Council, where various IDEM branches could explain their function and process, i.e., permit writers explain what they do; geologists explain their function, etc.

#### 2.3.1.2. Building a better relations with Indiana's business community

Set up meetings with business, industries and municipalities across the state. This will include touring the operations of a steel plant, a power plant or a wastewater treatment plant. Meet one-on-one with the environmental representatives at these operations, whether it be AEP's director of environmental science or the Shelbyville wastewater treatment plant operator to determine if there are any real or perceived problems with working with IDEM.

Develop positive relations with business and industry organizations through one-on-one interaction.

Assist Indiana's businesses with compliance questions, permits and technical assistance.

Work closely with the Indiana Department of Commerce's Business Ombudsman and IDEM's Office of Pollution Prevention and Technical Assistance and the Office of Community Relations in assuring that new and existing companies comply with environmental regulations.

Make a special effort to contact industries, such as foundries, which are declining in the state, by providing compliance assistance, and technical and permit assistance.

By: 12/31/04



Percent Complete

50%

Status:

Set up three meetings with legislators regarding issues in their districts. Met one-on-one with Sen. Beverly Gard. Met with representatives of a wood company in Logansport at Sen. Tom Weatherwax's request. Met with representatives of Waupauca Foundry, Sen. Richard Young and Department of Commerce staff. Met with Rep. Wolkins and Sen. Adams and representatives of Grace College in Winona Lake; met with Elkhart Chamber of Commerce and Sen. Riegsecker; met with Sen. Hume, Rep. Chowning and local elected officials in Bicknell; met with Sen. Craycraft and Rep. Liggett and attended a meeting of the Delaware County Commissioners and met with Sen. Gard, Rep. Cherry and members of the Hancock County Economic Development Council.

Responded to 314 legislative requests and 15 from business, industry and academia. Met with representatives of Lilly, met with representatives of Alcoa/Lafayette, met with representatives of magnet wire industry. Provided information to all legislators, business groups and local government groups on emissions credit registry.

## 2.4. Office of Community Relations

The Office of Community Relations assists the general public, local and state government officials and community groups with various environmental issues and concerns. The staff listens to community concerns and investigates and facilitates the resolution of these issues. Community Relations is also the lead office in the coordination of special events and conferences. The Office of Community Relations staff assists in the operation of the Compliance and Technical Assistance Program (CTAP).

### Office Contact(s):

OCR Director - Vacant  
Director  
Office of Community Relations

e-mail:

### 2.4.1. Agency Priorities

#### 2.4.1.1. Speaker's Bureau

Staff & topics have been identified and this information is on the Community Relations web page. Office of Community Relations will develop a marketing strategy to get the word out about this service. Also, Office of Community Relations will continue to update and revise this site and the information contained as needed.

Develop marketing strategy.

By: 6/30/03; updates - ongoing

Percent Complete  
100%

Status:

Staff updates continue to be made as needed to the list. The site is readily available to visitors to the website as part of the "Visitor's Center."

#### 2.4.1.2. Environmental Justice

Lead Office: OCR

Under IDEM's Environmental Justice Initiative, IDEM is committed to ensuring that no citizen or community within the State of Indiana, regardless of race, color, national origin, income, or geographic location, will bear a disproportionate share of the risks or consequences of environmental pollution or will be denied equal access to environmental benefits. IDEM has established the Indiana Environmental Justice Advisory Committee to assist IDEM in the implementation of its environmental justice strategic plan and environmental justice principles in all of our programs.

IDEM will continue to address environmental justice by:

***2.4.1.2.1. Obtaining and integrating demographic and environmental data currently available at IDEM, along with available relevant data from other agencies, and making it available and understandable for communities.***

The EJ Team will update maps and provide information to the Indiana Environmental Justice Advisory Committee, and maintain current information on the web site.

Ongoing through 6/30/05

Percent Complete  
50%

## Status:

IEJAC meetings occur on a monthly basis. This group continues to look at ways to incorporate EJ activities into IDEM policies and procedures. In addition, we are seeking federal funding to further help address EJ issues in communities. Information regarding a variety of issues is continually added to the EJ web site. The development of maps will be a continual process and will be update as needed.

Working with programs across the agency, and with other state agencies, for opportunities to conduct workshops for communities and stakeholder groups to educate them about IDEM, environmental issues, permitting, and public participation opportunities.

Integrate Permit Guide and IDEM's Guide for Citizen Participation.

By: 10/31/03

## Percent Complete

80%

## Status:

The guide has been integrated. We have not conducted specific workshops on the guide. Staff has gathered information from other states as to how they have incorporated environmental justice practices into their existing procedures, and IDEM is reviewing how and if some of those practices would apply to this Agency.

Developing a customized training model for staff to increase their understanding and sensitivity to environmental justice issues.

The Environmental Justice Team will establish a second round of environmental justice training focusing on how the agency can incorporate environmental justice principles in their work. The training will also focus on current environmental justice activities.

By: 12/31/03

## Percent Complete

0%

## Status:

We have not determined a need for a second round of training yet. No new developments have occurred. However, we may want to incorporate principles from other states once we have finished compiling information.

The Environmental Justice Team will begin conducting the second round of environmental justice training.

By: 12/31/04

## Percent Complete

0%

## Status:

See previous response

Researching successful mediation programs in other states with the goal of implementing a program for Indiana citizens to actively interact to resolve environmental disputes.

By: 12/31/03

## Percent Complete

80%

**Status:**

Information has been gathered about what other states are doing to promote environmental justice. We are further investigating those states that seem to have developed a successful public participation element. There may also be a change in position descriptions for the Office of Community Relations to include an ombudsman-type role.

**2.4.1.2.2. Provide outreach for Environmental Justice Program**

Lead Office:  
OCR

EPA Role: Provide guidance

IDEM will build on its EJ program by convening regular meetings of the Indiana Environmental Justice Advisory Committee, which will include members from various state agencies to provide a comprehensive approach to environmental justice solutions.

By: 12/31/03

**Percent Complete**

100%

**Status:**

Numerous meetings have been held - our goal is once a month. There is a good variety of participants from different sectors (state government, private business, and academia) and from different parts of the state. Efforts to expand the group will continue to be made.

## 2.5. Office of Investigations

The primary responsibility of the Office of Investigations (OI) lies in the support of voluntary compliance activities of IDEM Programs and Regional Offices through the deterrent effects of strong environmental enforcement actions against serious or repeat violators. Complaints investigated by OI are identified on the bases of significance of harm, entity violation history, and culpability. Investigations may be initiated in response to events that occur or may be designed as a broad-based proactive investigation in response to such issues as common violative practices within a regulated community.

Office Contact:  
Vacant  
e-mail: N/A

### 2.5.1. Agency Priorities

#### 2.5.1.1. Maintain Essential Environmental Services and Deliver Services in an Efficient Manner as Practical

**“Compliance and Enforcement Sampling Operations Plan”** to enhance compliance sampling and monitoring as well as establish an on-call sampling operations team to respond to environmental emergencies.

Final Plan Draft Complete

By: 10/1/03

Percent Complete  
100%

Status:  
Draft CE Team COP, providing guidance on the development of section specific COPs, is complete.

Agency-Wide Distribution and Implementation Training Complete:

By: 3/31/04

Percent Complete  
90%

Status:  
The CE Team COP as well as the Ag/SW Compliance Section and Emergency Response COP's have been implemented and are in use. Review and revision of the WW Compliance Section COP is underway.

First Trial Run Complete:

By: 12/1/04

Percent Complete  
0%

Status:  
Not on calendar to date.

**“Enforcement Case Development Training Program”** to enhance IDEM regulatory and enforcement staff knowledge of their role and responsibilities with respect to environmental enforcement.

## IGCN Training complete

By: 9/1/04

Percent Complete

0%

Status:

Not on calendar to-date.

## NWRO/NRO Training complete

By: 10/1/04

Percent Complete

0%

Status:

Not on calendar to-date.

## Southwestern Regional Office training complete.

By: 11/1/04

Percent Complete

0%

Status:

Not on calendar to-date.

“Agency-Wide Progressive Enforcement Plan” to promote fairness and consistency in IDEM enforcement methodology while reducing duplication of effort in the following ways:

- a) Enhanced referral and notification between the Office of Enforcement and Office of Investigations.
- b) Increasing program staff ability to identify proper referral type.

Develop plan for identifying proper enforcement response based upon violation history, culpability and/or significance of harm.

By: 7/1/04

Percent Complete

90%

Status:

Draft OI Case Selection Guidance is in final review before implementation.

Office of Investigations Director and Office of Enforcement Section Chiefs will meet quarterly to review plan effectiveness and revise as necessary.

Ongoing

Percent Complete

0%

Status:

First meeting is planned for August 26, 2004.

Conduct review of referrals made to both Office of Enforcement and Office of Investigations to identify those that should have been referred to the other.

By: 8/1/04

Percent Complete

0%

Status:

Not on calendar to-date.

Utilize review findings as basis for section/branch/program specific enforcement referral training/education.

By: 12/31/04

Percent Complete

0%

Status:

Not on calendar to-date.

## 2.6. Office of Enforcement

An important step toward making Indiana a cleaner, healthier state is to insure businesses, individuals, and government entities are complying with environmental laws. The Indiana Department of Environmental Management's (IDEM) Office of Enforcement (OE) mission is to respond to violations with timely, quality enforcement actions which accomplish three (3) major goals:

- (1) achieve compliance,
- (2) deter future violations, and
- (3) result in an improved environment.

### Office Contact

Felicia Robinson  
Office of Enforcement  
(317) 233-3978  
e-mail: [frobinso@dem.state.in.us](mailto:frobinso@dem.state.in.us)

IDEM uses the toll of enforcement through a series of legal actions to bring facilities into compliance with the law (Statute Authority IC 13-13-3-3).

### 2.6.1. Agency Priorities

#### 2.6.1.1. Enhance IDEM's Compliance/Enforcement Team

The Compliance/Enforcement Team provides the base for true multi-media initiatives. These initiatives will include periodic cross media educational opportunities and open forums designed to enable staff to identify cross media concerns and provide coordinated approaches to regulated community compliance assistance and enforcement actions. The Compliance/Enforcement Team will enhance IDEM staff's ability to identify and pursue appropriate compliance and enforcement actions through the establishment of model referrals, better coordination with IDEM's regional offices, compliance documentation and enforcement case management training, as well as information and evidence collection training.

Continue work of agency-wide Compliance Enforcement Team to meet/communicate regularly to evaluate information and formulate agency-wide compliance and enforcement strategies and resource allocation.

By: 6/30/05

Percent Complete  
50%

#### Status:

The C/E team continues to meet at least 1-2 times per month. Requests for future topics were discussed and will be added to agendas. The Team recently developed a list of closing facilities which will be updated, distributed, and discussed at the 1<sup>st</sup> meeting of each month.

#### 2.6.1.1.1. Continue Compliance/Enforcement Planning

Lead Office:  
OE

a) Continue multi-media compliance and enforcement planning and coordination in accordance with current operating procedures (COP) developed by the Compliance Enforcement Team during 2000-2001. Utilize Compliance/Enforcement Planning COP and periodically revise (as needed).

Ongoing



Percent Complete  
50%

Status:

Multi-media compliance and enforcement planning continues, and we revisit the issues every few months. Concerns regarding EPA - lead multi-media inspections were discussed. Quarterly update of the Facilities of Concern list was completed. Communication on closing facilities was discussed and a workgroup was formed. Pollution Complaint Clearinghouse tracking is being revisited. Briefing done on auto salvage initiative. Planning COP has been reviewed and is to be revised based on the review.

- b) Each compliance branch will work with the NWRO to come up with focused inspection and compliance goals for each of the steel mills.

Ongoing

Percent Complete  
0%

Status:

The NWRO and OPA are working to get the project moving again.

- c) Determine if and how multi-media steel mill meetings will occur. If it is decided that the meetings will be held, program offices will meet to discuss a format and content for the meetings with the steel mills.

By: 6/30/04

Percent Complete  
0%

Status:

The NWRO and OPA are working to get the project moving again.

- d) Continue development and implementation of steel mill Compliance Action Plan.

By: 6/30/04

Percent Complete  
0%

Status:

The NWRO and OPA are working to get the project moving again.

- e) Continue development and implementation of foundry sector Compliance Action Plan.

Ongoing

Percent Complete  
50%

Status:

Group working on this met once and will continue to meet each quarter. Second meeting held 1-12-04. Industrial waste conducted workshops and training. Industrial waste inspections have begun. OAQ completed 53% of inspections at major foundries. OPPTA and OLO working with INCMA to promote foundry sand reuse. Met 7/14/04 to discuss progress made during last quarter of fiscal year.

- f) Each office will work with the NWRO to come up with goals and objectives for each of the Indiana steel mills.

By: 6/30/04 and 6/30/05

Percent Complete  
0%

Status:  
The NWRO and OPA are working to get the project moving again.

#### **2.6.1.1.2. Improve Inspection and Enforcement Procedures**

Lead Office:  
OE

Develop a model referral and referral checklist to help generate a complete and high quality referral.

By: 6/30/04

Percent Complete  
100%

Status:  
The project was completed in June 2004.

Review and evaluate the inspection process after implementing the February 4/03 COP for Conducting Single-Media Inspections.

By: 6/30/04

Percent Complete  
80%

Status:  
Reviewed and revised multi-media checklist and verification of inspection form. Discussed additions to the MM Screening Exceptions list and re-sent list for review. Currently reviewing Violation Letter/Summary process. SOP for digital photos is finalized and ready for implementation. MM Screening COP reviewed and will be revised. Planning will begin for MM Training. VL/Summary Letter revised, Referral to Enforcement letter developed.

#### **2.6.1.1.3. Compliance and Enforcement Sampling Operations Plan**

Lead Office:  
OI

"Compliance and Enforcement Sampling Operations Plan" to enhance compliance sampling and monitoring as well as establish an on-call sampling operations team to respond to environmental emergencies.

By: 10/1/03 - final draft plan

3/31/04 - Agency-Wide Distribution and Implementation Training Complete

12/1/03 - First Trial Run Complete

Percent Complete  
90%

Status:  
CE Team COP providing guidance on the development of section specific COP is complete. Section specific COPs are also complete and final, exception of the water section, which is still in the review stages.

#### **2.6.1.1.4. Enforcement Case Development Training Program**

Lead Office:  
OI

Enhance IDEM regulatory and enforcement staff knowledge of their role and responsibilities with respect to environmental enforcement.

Training Material Prepared and Presenters Identified.

By: 9/1/04 - IGCN Training complete  
10/1/04 - NWRO/NRO Training complete  
11/1/04 - SWRO Training complete

Percent Complete  
0%

Status:  
No activity this quarter.

#### **2.6.1.1.5. Agency-Wide Progressive Enforcement Plan**

Lead Office:  
OI

“Agency-Wide Progressive Enforcement Plan” to promote fairness and consistency in IDEM enforcement methodology while reducing duplication of effort in the following ways:

1) Enhanced referral and notification between the Office of Enforcement and Office of Investigations; and 2) Increasing program staff ability to identify proper referral type.

Develop plan for identifying proper enforcement response based upon violation history, culpability and/or significance of harm.

By: 7/1/04

Percent Complete  
95%

Status:  
Office of Investigations Case Selection Guidance was prepared as a counterpart to OE's Enforcement Referral Policy. This guidance will serve to enhance the ability of program staff to identify proper enforcement type and will serve as a starting point for coordination between OE and the Office of Investigations. The selection guidance is under review at this time. Awaiting upper-level review.

Office of Investigations Director and OE Section Chiefs meet quarterly to review plan effectiveness and revise as necessary.

Ongoing

Percent Complete  
50%

Status:  
Acting Director meets regularly with OE Section Chiefs

Conduct review of referrals made to both OE and Office of Investigations to identify those that should have been referred to the other.

By: 8/1/04

Percent Complete  
50%

Status:  
First monthly meeting scheduled for August 2004.

Utilize review findings as basis for section/branch/program specific enforcement referral training/education.

By: 12/31/04

Percent Complete  
0%

Status:  
No activity this quarter.

#### **2.6.1.2. Continuing Timely, Accurate Enforcement**

The Office of Enforcement will continue to provide support to IDEM's programs (including the Office of Air Quality, Office of Water Quality, and Office of Land Quality) for enforcement actions.

#### **2.6.1.3. 5. Building a Better IDEM - Expand Health and Safety Training**

Explore possibility of expanding in-house 8-hour training.

Establish training curriculum relevant to Office of Water Quality, Office of Air Quality, Office of Pollution Prevention and Technical Assistance, and the Office of Legal Counsel for in-house training programs.

By: 9/1/03

Percent Complete  
100%

Status:  
New training curriculum developed for 2004 updates. Training developed to meet the needs of all program areas.

Implement in-house training of new curriculum.

By: 3/31/04

Percent Complete  
100%

Status:  
New curriculum presented for OLQ staff. Twelve 8-Hour Updates have been conducted for staff in 2004.

Develop "train-the-trainer" curriculum for in-house First Aid/CPR training.

- Train 25% of field staff in First Aid/CPR.

By: 6/1/04

Percent Complete

40%

Status:

Forty staff received First aid/CPR training in May/June 04.

- Offer training for non-field staff in First Aid/CPR.

By: 12/31/04

Percent Complete

0%

Status:

Not started.

- Compile and disseminate security and personal safety information.

- Conduct informational sessions to discuss relevant building security and emergency preparedness in all IDEM locations.

By: 10/1/03

Percent Complete

100%

Status:

Emergency Action Plan completed, and informational sessions have been conducted. Ongoing process of information dissemination and training. Review of evacuation drills conducted and communicated to all staff through Agency update memos.

- Review and revise Emergency Action Plans for all locations to address concerns recognized from staff during informational sessions.

By: 12/31/03

Percent Complete

100%

Status:

Information from staff used to update and address concerns associated with emergency preparedness. Revised all floor plan maps to exhibit tornado safe areas,

- Disseminate updated Emergency Action Plans to all staff.

By: 2/28/04

Percent Complete

100%

Status:

Distributed Emergency Action Plan to staff. Trained Floor Wardens, conducted informational sessions and procured safety equipment to assist in an emergency.

- Continue involvement in Indiana Government Center Core Team for emergency preparedness to ensure that the Agency's plan is consistent with the campus plan.

By: 5/31/04

Percent Complete

100%

Status:

Continued involvement in campus initiative. Concerns received from staff have been communicated and addressed by Facilities staff.

## 2.6.2. Office Priorities

### 2.6.2.1. Active Exceptions list

Reduce the Active Exceptions list to less than 2% of the total active NPDES permitted facilities.

By: 6/30/05

Percent Complete

Unknown

Status:

We are unable to determine current compliance with this goal, because EPA has not prepared an exception list since 12-02. Waiting on this EPA list.

Maintain a Significant Noncompliance rate  $\leq$  10%.

Ongoing

Percent Complete

8.3% of major

Status:

As of June 8, 2004, there are 16 of 192 major NPDES permit holders on the Significant Noncompliance list.

### 2.6.2.2. Expand Health and Safety Training Program

The training program has been established to provide relevant health and safety training to all staff meeting the agency definition of field inspector. The policy requires an initial 24 Hour or 40 Hour course of instruction (depending on position responsibilities) followed by an annual 8-Hour Refresher. Currently there is approximately 400 staff that require the annual update.

Training Program purpose:

To establish and implement a consistent Health and Safety Training Program within IDEM to provide training in accordance with Occupational Safety and Health Administration (OSHA) standards found in 29 CFR 1910.120. The training program will effectively meet the following objectives:

- Assure that employees are aware of potential hazards they may encounter during the performance of field activities.
- Provide the knowledge and skills necessary to perform the work with the least possible risk to personal health and safety.
- Assure that program goals are accomplished in as safe and healthful manner as feasible.

- Assure that employees can safely disengage themselves from an actual hazardous situation that may occur during a field activity.

#### Program Activities:

Develop training programs based upon common injuries in the workplace

- Review work practices that involve lifting and carrying.
- Identify affected programs.

By: 5/31/03

Percent Complete  
100%

Status:  
Integrated back safety & ergonomics into 8-Hour update.

#### Develop Agency Training Manual

- Address all relevant Occupational Safety and Hazard Administration (OSHA) topics.
- Regulation overview and applicability to IDEM activities.
- Develop checklists and inspection guidelines.

By: 12/31/03

Percent Complete  
75%

Status:  
Hazard communication program completed and inventory of hazardous materials to be maintained on Agency shared drive.

#### Develop a Personal Protective Equipment Policy for the agency.

- Define use and replacement guidelines for all personal protective equipment.
- Establish essential equipment list for all field programs.
- Establish standardized equipment list for programs to maintain and use for all non-field staff.

By: 11/30/03

Percent Complete  
95%

Status:  
The development of a Personal Protective Equipment Policy for the agency is due for release on July 21, 2004.

#### Develop Confined Space Entry/Awareness Training program

- Revise Office of Land Quality policy to an agency policy.
- Develop checklists for inspectors to evaluate company plans.
- Conduct training sessions.

By: 2/1/04

Percent Complete  
100%

Status:  
Training program continually reviewed to ensure applicability to staff needs.

#### Centralize Medical Monitoring Program

- a) Integrate Health & Safety Training database with medical monitoring information.
- b) Streamline scheduling and reporting procedures.

By: 4/30/03

Percent Complete  
100%

Status:  
Complete

#### Implement First Aid/CPR training for staff

- a) Priority system for class attendance.

By: 11/30/03

Percent Complete  
50%

Status:  
Conducting 6 - 8 CPR/First Aid classes each year.

#### Develop new Health & Safety training database.

- A. Identify training needs to position
- B. Identify pre-needs to position
- C. identify medical monitoring requirements for position

By: 1/30/04

Percent Complete  
75%

Status:  
Model developed and needs assessment complete. Waiting for development process to be initiated by IT.



## 2.7. Office of Land Quality

The OLQ is charged with protecting public health and the environment by assuring planning for, and the proper handling and disposal of, wastes in Indiana; protecting the public in the event of chemical spills and other environmental emergencies; and addressing short and long-term cleanup projects at contaminated sites throughout the state.

The Assistant Commissioner and Deputy Assistant Commissioner work as a team to assure that sound environmental policies are developed and implemented relative to the protection and remediation of land in the State of Indiana. The Deputy Assistant Commissioner may focus on special initiatives while assisting the Assistant Commissioner in directing and supervising a large number of resources and staff.

### Office Contacts:

Vacant  
Assistant Commissioner  
Office of Land Quality

Bruce Palin  
Deputy Assistant Commissioner  
Office of Land Quality  
(317) 233-6591  
e-mail: bpalin@dem.state.in.us

### 2.7.1. Agency Priorities

#### 2.7.1.1. Building a Better IDEM – Centralized Web Development

Lead Office: MACS/OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to the Office of Media and Communications Services.

Share information on office publications for use in the on-line publication catalog/archive.

#### 2.7.1.2. Building a Better IDEM – Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

Office Data Contacts (ODCs) will actively participate in data management team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. ODCs will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance.

Ongoing through 6/30/05

Percent Complete  
50%.

Status:  
OLQ continues to participate in data management team meetings and activities.

#### 2.7.1.3. Building a Better IDEM – Establish Facility Registry System (I-FRS)

Lead Office: OPA/OMBA-BSD

Assist with mapping the Indiana Facility Registry System to ULCERS, and possibly map RCRA Info / Indiana RCRA Activity Tracking System (IRATS) to the Indiana Facility Registry System.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
Request for Quote (RFQ) out for Phase II of I-FRS construction.

#### **2.7.1.4. Building a Better IDEM – Geography Network**

Lead Office: OMBA-BSD

Participate in Geographic Information System (GIS) data inventory and in drafting and implementing a metadata development plan.

By: 10/01/03

Percent Complete  
100%

Status:  
OLQ complied with request for inventory.

#### **2.7.1.5. Building a Better IDEM – Address Quality Issues – Quality Management Plan**

Lead Office: OPA

Actively participate in the Region 5 State Science Council efforts as well as the IDEM 'peer review' panel development and implementation processes.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
Have participated in monthly Region 5/state science council conference calls with other IDEM office of air, land, and water participants. Have also coordinated a few EPA sponsored in-house teleconference science presentations for IDEM office staff. Disseminated other quality information received from EPA Region 5 or headquarters.

#### **2.7.1.6. Maintain Essential Environmental Services – Agency-Wide Permit Team**

Lead Office: Deputy Commissioner / OPA

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
Group has been assembled and monthly meetings are held. Workplan developed in the form of a continuously updated topical listing.

#### **2.7.1.7. Maintain Essential Environmental Services – Internet Public Notice Standardization**

Lead Office: OPA

Participate in workgroup. Assist the Office of Planning and Assessment in the standardization of public notice information posted via the Internet

Ongoing through 6/30/05

Percent Complete  
20%

Status:  
Presentation to Permit Team held. Workgroup to address this issue will soon be assembled.

#### **2.7.1.8. Maintain Essential Environmental Services – Compliance / Enforcement Team**

Lead Office: OE

Routinely participate in Compliance / Enforcement Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
Regularly scheduled meetings of the C/E Team are continuing. OLQ continues to participate in CE Team meetings and activities.

#### **2.7.1.9. Reducing Key Environmental Threats – Coordinating with SEMA to develop and implement emergency response plans**

Lead-Office: OLQ

Participate in developing and updating multi-agency counter-terrorism response plans and all hazards plans. (Indiana State Agency Comprehensive Emergency Management Plan, U.S. EPA Area Contingency Plans for Indianapolis and Louisville, Board of Animal Health Foreign Animal Disease Plan, Indiana Continuity of Government Plan)

By: Ongoing

Percent Complete  
50%

Status:  
Emergency Response participation is ongoing.

Contribute to the design and participate in local, state, and federal counter-terrorism and hazmat response and recovery exercises. (Chemical Stockpile Emergency Preparedness Plan (CSEPP (VX)), Operation River City (Louisville), Hoosier Guardian, Local Emergency Planning Committee exercises, Pipeline Group tabletops)

Coordinating with State Emergency Management Agency to develop a drinking water system response protocol that will be incorporated into Indiana's Statewide Comprehensive Emergency Management Plan. The response protocol will be designed to address two important aspects of emergency planning and response. First, the protocol will address how specifically the state will respond to an incident, real or threatened, at a public water system. The second portion of the protocol will deal with the decision making process for determining what to communicate to the public and what steps to take regarding the safety and use of the drinking water based on the findings of the initial investigation.

By: 1/31/04

Percent Complete  
50%

Status:  
Emergency Response participation is ongoing.

Participate in multi-agency counter-terrorism and hazmat response forums (Counter-Terrorism and Security Council, Safe Schools Advisory Council, Purdue University Homeland Security Institute, U.S. EPA Region 5 Regional Response Team.)

Provide staff and support to the Indiana Emergency Response Commission

Provide after hour's duty roster of IDEM staff to State Emergency Management Agency for staffing State Emergency Management Agency's Emergency Operations Center.

Participate in State Emergency Management Agency advisory committee regarding Federal Emergency Management Agency and Department of Justice counter-terrorism grants.

#### **2.7.1.10. Reducing Key Environmental Threats – Risk Advisory Committee**

Lead-Office: OLQ

#### **Risk Integrated System of Closure**

Institutionalize the Risk Integrated System of Closure policy (i.e. Project Manager and Technical staff training, additional resources for Risk Integrated System of Closure reviewers).

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
The bi-weekly Risk Integrated System of Closure (RISC) Availability sessions for staff have completed the study of the entire Technical Guide. A special session was held for studying Plume Stability and Attenuation Monitoring. Staff interest and concerns will be monitored, and additional special availability sessions will be held on an "as needed" basis.

Evaluate reallocating more staff resources to completing Risk Integrated System of Closure reviews.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Staff resources and tasking are discussed in bi-weekly RISC Advisory Board meetings. Bi-weekly meetings of the RISC Section Technical Environmental Specialists and support staff continue to coordinate resource allocation, prioritize tasks to support staff, etc..

Evaluate current Risk Integrated System of Closure Manuals for improved clarity and organization in an effort to provide complementary manuals that are user friendly.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Portions of the User's Guide, Chapter 2 (RCRA) have been updated, and Chapter 3 (LUST) first draft was completed and has received limited internal review. Six (6) public outreach sessions were conducted throughout the State. The Technical Guide Appendix 1, Default Closure Table, was updated and posted on the web on January 1, 2004. Eleven (11) new compounds were added. A poster session presentation on RISC was made at the American Chemical Society meeting. A guideline for providing an alternate water supply was drafted, and has been reviewed by the Drinking Water Branch of OWQ. A guideline for health-based vapor intrusion action levels was drafted.

Improve coordination with all sister agencies who have tasks related to Risk Integrated System of Closure in an effort to define roles and responsibilities for greater resource efficiency.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Preliminary discussions held with staff at the Indiana State Department of Health to improve coordination. Indiana Department of Transportation representatives attend the RISC Availability Sessions. Coordinated with IOSHA on the vapor intrusion guidelines. Developing a public information piece about vapor intrusion with the ISDH.

Develop and implement timeframe for finalizing the Total Petroleum Hydrocarbons (TPH) and Vapor Intrusion policies.

By: 6/30/04 and 6/30/05

Percent Complete  
80%

**Status:**

A second draft of the proposed policy has been developed for Total Petroleum Hydrocarbons, and comments from the TPH Workgroup have been incorporated. Concerns about analytical laboratory procedures are being investigated. Once they are resolved, a draft will be ready for distribution to staff of OLQ. Vapor Intrusion is on hold pending contract issues. The Alternate Water Supply non-rule policy has been reviewed and commented on by OWQ Drinking Water Branch staff. The final draft is waiting for examples of Short Term Action Levels to be developed for BTEX and some chlorinated solvents before starting down the Nonrule policy document path.

**2.7.1.11. Prioritize Office of Land Quality Services and Programs**

Lead-Office: OLQ

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Percent Complete  
100%

**Status:**

OLQ has identified Excess Liability Trust Fund (ELTF), RCRA Correction Action, beyond Government Performance and Review Act (GPRA), Waste Tires, Confined Feeding Operations (CFOs) Permitting (CAFO/NPDES specifically), Managing Risk Integrated System of Closure (RISC) Resources, contract management, and data management as our priorities.

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

Additional staff resources allocated to Enhanced Liability Trust Fund (ELTF). RCRA Corrective Action sites are currently being reviewed by staff to reevaluate prioritization. The Confined Animal Feeding Operation (CAFO)/National Pollutant Discharge Elimination System (NPDES) Rule was final adopted by the Solid Waste Management Board on March 24, 2004. A Contract Request document finalized, and forwarded to staff.

Semi-annual reviews.

By: 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Percent Complete  
50%

**Status:**

Review completed on December 30, 2003. Second review completed June 30, 2004.

## 2.7.2. Office Priorities

### 2.7.2.1. Information Management

PPG (Y/N): N

Maintain/update Geographic Information System (GIS) coverages.

By: 6/30/04 and 6/30/05

Percent Complete  
70%

Status:

All Geographic Information System (GIS) coverage's showing the locations of OLO regulated facilities are updated quarterly. The most recent was completed June 30, 2004. OLO staff continue to collect mapping-grade GPS locations for regulated facilities, and at this time we estimate that we have 70% collected.

Improve Resource Conservation and Recovery Act (RCRA) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) site coordination by continuing to work toward Universal Site Database.

By: 6/30/04 and 6/30/05

Percent Complete  
35%

Status:

OLO is in the process of phasing out Paradox-based tracking systems. We are consolidating our regulatory and facility information into our two main data systems, OLO Info. (RCRA, Solid Waste permitting, compliance, and Corrective Action) and ULCERS (remediation). Solid Waste permitting integration into OLO Info is nearly complete.

Evaluate current data collection procedures (i.e. value/gaps), and implement standardized electronic data submittal processes; to further develop and support systems to meet program management and staff needs.

By: 6/30/04 and 6/30/05

Percent Complete  
15%

Status:

Standardized formats have been developed for electronic submittal of sampling data and locational data.

Develop an interface with new databases converted from Paradox for staff use.

By: 6/30/04 and 6/30/05

Percent Complete  
30%

Status:

The office's larger Paradox systems (Permits Tracking, Composting, Guidance Documents, etc.) are currently being converted to Access or Oracle-based applications. Once the major systems are converted, we will begin working on the smaller systems.

**2.7.2.2. OLQInfo Update**

PPG (Y/N): N

EPA Role: Grant Funding

OLQInfo is the data management system that the Office of Land Quality uses to track regulatory information about Resource Conservation and Recovery Act (RCRA) and Solid Waste regulated activities and operations in Indiana. The Office of Land Quality will improve the agency's ability to manage the confined feeding program by:

- 1) creating a new module in OLQInfo for the Confined Feeding Operation (CFO) program, and,
- 2) transferring existing Confined Feeding Operation (CFO) data from the current Paradox-based system to a more robust Oracle system.

**The project will also include updating the system interface to:**

A) Improve user interaction with the database, reducing the burden in sharing critical National Pollutant Discharge Elimination System (NPDES) Confined Animal Feeding Operation (CAFO) data with Permit Compliance System (PCS) data via the National Environmental Information Exchange Network (NEIEN), and

B) Integrate OLQInfo with the Indiana Facility Registry System (I-FRS) to facilitate sharing information with other state and federal databases.

By: 4/1/05

Percent Complete

5%

Status:

This project has been temporarily suspended because the funding allocated for the project was needed for other purposes.

**2.7.2.3. Identify and Design initiatives to assess and improve OLQ's internal business operation and quality of work life.**

PPG (Y/N): N

Develop consistent office-wide process management measures for key processes including cycle time reduction, constituent feedback, performance, cost reduction and resource allocation.

By: 6/30/04 and 6/30/05

Percent Complete

25%

Status:

Contract Process document has been completed and forwarded to staff. Contract Request document finalized, and forwarded to staff.

Establish current operating procedure for staff tracking of contracts.

By: 6/30/04 and 6/30/05

Percent Complete

100%

Status:

Contract tracking database has been created, and is updated on an ongoing basis.

Update Office of Land Quality locator directory.



By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Locator directory was updated in December 2003. The next update is scheduled to be completed in December 2004.

#### 2.7.2.4. Risk Integrated System of Closure

PPG (Y/N): N

Institutionalize the Risk Integrated System of Closure policy (i.e. Project Manager and Technical staff training, additional resources for Risk Integrated System of Closure reviewers).

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

The bi-weekly RISC Availability Sessions for staff have completed the study of the entire Technical Guide. A special session was held for studying Plume Stability and Attenuation Monitoring. Staff interest and concerns will be monitored, and additional special availability sessions will be held on an "as needed" basis.

Evaluate reallocating more staff resources to completing Risk Integrated System of Closure reviews.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Staff resources and tasking are discussed in bi-weekly RISC Advisory Board meetings. Bi-weekly meetings of the RISC Technical Specialists and support staff continue to coordinate resource allocation, prioritize tasks to support staff, etc.

Evaluate current Risk Integrated System of Closure Manuals for improved clarity and organization in an effort to provide complementary manuals that are user friendly.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Portions of the User's Guide, Chapter 2 (RCRA) have been updated, and Chapter 3 (Leaking Underground Storage Tanks (LUST)) first draft was completed and had received limited internal review. Six (6) public outreach sessions were conducted throughout the State. The Technical Guide Appendix 1, Default Closure table, was updated and posted on the web by January 1, 2004. Eleven (11) new compounds were added. A poster session presentation on RISC was made at the American Chemical Society meeting. A guideline for providing an alternate water supply was drafted, and has been reviewed by the Drinking Water Branch of OWQ. A guideline for health-based vapor intrusion action levels was drafted.

Improve coordination with all sister agencies who have tasks related to Risk Integrated System of Closure in an effort to define roles and responsibilities for greater resource efficiency.

By: 6/30/04 and 6/30/05

Percent Complete

50%

Status:

Preliminary discussions held with staff at Indiana State Dept. of Health to improve coordination. Indiana Dept. of Transportation representatives attend the RISC Availability Sessions. Coordinated with Indiana Occupational Safety & Hazard Administration (IOSHA) on the vapor intrusion guidelines. Developing a public information piece about vapor intrusion with the Indiana State Department of Health (ISDH).

Develop and implement timeframe for finalizing the Total Petroleum Hydrocarbons and Vapor Intrusion policies.

By: 6/30/04 and 6/30/05

Percent Complete

80%

Status:

A second draft of the proposed policy has been developed for Total Petroleum Hydrocarbons, and comments from the Total Petroleum Hydrocarbons (TPH) Work Group have been incorporated. Concerns about analytical laboratory procedures are being investigated. Once they are resolved, a draft will be ready for distribution to staff of OLQ. Vapor Intrusion is on hold pending contract issues. The Alternate Water Supply non-rule policy has reviewed and commented on by OWQ Drinking Water Branch staff. The final draft is waiting for examples of Short Term Action Levels to be developed for BTEX and some chlorinated solvents before starting down the Nonrule Policy Document (NPD) path.

#### 2.7.2.5. Confined Animal Feeding Operations (CAFO)

PPG (Y/N): Y

IDEM will implement the Confined Animal Feeding Operation (CAFO) General Permit Rule and comply with Federal regulations.

By: 6/30/04 and 6/30/05

Percent Complete

100%

Status:

The CAFO General Permit Rule was final adopted by the Water Pollution Control Board on January 14, 2004. It became effective on March 24, 2004, and the permit and compliance activities associated with the rule are fully implemented.

#### 2.7.2.6. Reducing Risk

PPG (Y/N): N

Targeting specific contaminants from the Office of Land Quality priority pollutant list (Top Ten Contaminant List).

By: 6/30/04 and 6/30/05

Percent Complete  
0%Status:  
OLQ will discuss at an upcoming Branch Chief Meeting.

Targeting specific contaminants from the Office of Land Quality priority pollutant list (Top Ten Contaminant List).

By: 6/30/04 and 6/30/05

Percent Complete  
0%Status:  
OLQ will discuss at an upcoming Branch Chief Meeting.

Developing a process to make better risk based decisions and allocation of resources.

By: 6/30/04 and 6/30/05

Percent Complete  
0%Status:  
OLQ will discuss at an upcoming Branch Chief Meeting.

Assisting other IDEM offices in addressing their priority contaminants.

By: 6/30/04 and 6/30/05

Percent Complete  
0%Status:  
OLQ will provide support as requested.

### 2.7.3. Remediation Branch Priorities

Bruce Oertel, Branch Chief, (317) 232-4535, e-mail: boertel@dem.state.in.us

#### 2.7.3.1. Site Investigation

PPG (Y/N): N

Conduct up to twelve (12) Integrated Assessments per fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
25%Status:  
Three (3) of twelve (12) assessments have been completed. Other assessments are underway.

Conduct up to five (5) Site Reassessments per fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
40%

Status:  
Two (2) of five (5) assessments have been completed.

Conduct up to four (4) Expanded Site Assessments per fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
0%

Status:  
Zero (0) assessments completed, two (2) underway.

Prepare up to three (3) Hazard Ranking System (HRS) Packages or as needed, within 180 days of notice to EPA.

During: FY 2003 - 2005

Percent Complete  
34%

Status:  
One (1) completed, up to six (6) potential starts.

Conduct Pre-CERCLIS (Comprehensive Environmental, Response, Compensation and Liability Information System) Screenings as needed.

During: FY 2003 - 2005

Percent Complete  
100%

Status:  
Forty-one (41) completed. Pre-CERCLIS Screenings scheduled for completion upon receipt of site discoveries.

Conduct Resource Conservation and Recovery Act (RCRA) PA/VSI reviews as needed.

During: FY 2003 - 2005

Percent Complete  
0%

Status:  
Zero (0) completed, zero (0) underway.

#### 2.7.3.2. Brownfields

PPG (Y/N): N

Complete/review up to ten (10) Brownfields Environmental Assessments (BEAs) or equivalent investigations for communities.

By: 6/30/04 and 6/30/05

Percent Complete  
20%

Status:  
Two (2) BEAs underway. Number of equivalent investigation review is accounted for under technical document reviewed below.

Conduct the review of up to twenty (20) Brownfields technical documents.

By: 6/30/04 and 6/30/05

Percent Complete  
>100%

Status:  
Sixty-eight (68) document reviews for Comfort/Site Status Letter requests and grant/loan oversight.

Publish four (4) Brownfields Bulletins on a quarterly basis.

By: 6/30/04 and 6/30/05

Percent Complete  
>100%

Status:  
Four (4) Brownfield Bulletins published (2nd quarter 2003, issue #20, 3rd quarter 2003, Issue #21, 4th quarter 2003, issue #22, and 1st quarter 2004, issue #23), and one (1) Brownfield Bulletin (2nd quarter 2004, issue #24) underway.

Conduct up to four (4) Indiana Brownfields Task Force meetings.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
Two (2) Task Force meetings held, one in July 2003, and another held in October 2003. Two communities that received assistance from the Task Force (advice/recommendations) proceeded to receive further state and federal financial assistance to facilitate redevelopment efforts.

Conduct or participate in Brownfields workshops, seminars, and conferences as requested.

By: 6/30/04 and 6/30/05

Percent Complete  
100%

Status:  
Ongoing as requested. Fulfilled all requests and volunteered. Participated in fourteen (14) workshops/conferences as speaker or exhibitor. There were no requests for presentations this quarter. Most education/outreach has been through small community meetings and/or conference calls.

Incorporate the new federal Brownfields legislation into the State Brownfields Program.

By: 6/30/04 and 6/30/05

Percent Complete  
70%

Status:  
 New definition of "brownfield" incorporated. New liability tools under discussion/development. Determination of compliance with "All Appropriate Inquiry" criteria continues to be under discussion. Necessary modifications to ULCERS database being made to track information regarding IDEM's required technical oversight for all U.S. EPA grant-funded sites in Indiana, among other reporting measures. Support letters for communities that applied for second round of U.S. EPA grant funding in December 2003 were provided per legislation/guidelines. Discussions of IDEM applying for third U.S. EPA grant round continue. Aspects of federal legislation and grant funding including in outreach forums/materials/web page.

### 2.7.3.3. Abandoned Landfills

PPG (Y/N): N

Assess four (4) additional abandoned landfills.

By: 6/30/04 and 6/30/05

Percent Complete  
 40%

Status:  
 Reprioritization of sites will be performed before adding additional sites to be assessed. Those sites that rank highest in priority will be added at that time for assessment consideration.

Continue assessment work begun on abandoned landfills begun in years 2000 and 2001.

By: 6/30/04 and 6/30/05

Percent Complete  
 35%

Status:  
 Awaiting data from an EPA conducted sampling event at the White Lick Creek Dump, Marion County, for future consideration of removal actions. At the Fredrickson Park Landfill, St. Joseph County, 85% of the landfill cap and the methane removal system have been installed.

Continue to develop non-rule policy document addressing abandoned landfills.

By: 6/30/04 and 6/30/05

Percent Complete  
 80%

Status:  
 Work continues in the development of a non-rule policy document to assist the public in addressing issues related to sampling, closure, and remediation of abandoned landfills.

Provide education and outreach to communities and parties with abandoned landfills in need of assessment and remediation.

By: 6/30/04 and 6/30/05

Percent Complete  
 70%

**Status:**

During this quarter, outreach activities have been provided to the City of South Bend, St. Joseph County, regarding remediation and the closure of the Fredrickson Park Landfill and Ireland Road Landfill; the City of Plainfield for Shouse Landfill; Hendricks County and the responsible party for Warrick Landfill; and Valparaiso/St. Joseph County for Munster Landfill.

Continue to coordinate with other sections when landfill conditions warrant other expertise/funding mechanisms (i.e. Brownfields, Site Investigation, and Voluntary Remediation Program).

By: 6/30/04 and 6/30/05

**Percent Complete**

50%

**Status:**

Staff has coordinated efforts with Brownfield, Solid Waste, and Hendricks County staff regarding the following landfills: Warrick and Shouse Landfills in Hendricks County; Munster Landfill, Valparaiso, Porter County, Ireland Road Landfill, South Bend, St. Joseph County.

**2.7.3.4. Superfund**

PPG (Y/N): N

Continue and/or begin three (3) site contamination studies (Remedial Investigations/Feasibility Studies).

By: 6/30/04

**Percent Complete**

67%

**Status:**

Remedial Investigations/Feasibility Studies (RI/FS) underway at the Cam-Or Superfund site, and Administrative Order on Consent (AOC) to conduct RI/FS activities signed April 2004 for the Town of Pines.

Complete four (4) decision documents and continue working toward other decision documents (Record of Decision, Record of Decision Amendment or Explanation of Significant Difference) for target sites.

By: 6/30/04

**Percent Complete**

55%

**Status:**

Record of Decision (ROD) Amendment signed for the Continental Steel Superfund site; proposed plans prepared for the Little Mississinewa River Sediment site and Himco Dump site.

Continue and/or begin ten (10) site Remedial Design/Remedial Actions (RD/RA).

By: 6/30/04

**Percent Complete**

100%

Status:  
Twelve (12) sites in the Superfund program are in the Remedial Design/Remedial Actions (RD/RA) phase.

Continue and/or begin Operation and Maintenance (O&M) for eighteen (18) sites.

By: 6/30/04

Percent Complete  
100%

Status:  
Eighteen (18) Superfund sites are in the Operation and Maintenance (O&M) phase.

Complete seven (7) Five-Year Review Reports.

By: 6/30/04

Percent Complete  
80%

Status:  
Five (5) Five-year review reports completed, and one (1) underway.

#### **2.7.3.5. Continental Steel (Superfund Project)**

PPG (Y/N): N

(a) Complete Remedial Designs for Contract Units 1-5.

By: 9/30/03

Percent Complete  
40%

Status:  
Contract 1, Excavation and Consolidation of solids, Contract 3, Markland Quarry Sediment Removal, Contract 4, Markland Quarry Cover, and Contract 4, Main Plant completed.

(b) Select a construction contractor for Contract Unit 3.

By: 6/30/05

Percent Complete  
0%

Status:  
Remedial Action has not been funded.

(c) Select Construction Contractor for Contract Unit 4 for Continental Steel Site.

By: 6/30/05

Percent Complete  
0%

Status:  
Remedial Action has not been funded.

(d) Provide project oversight of construction activities for Contract Unit 1.



Through 12/31/04

Percent Complete  
0%Status:  
Remedial Action has not been funded.**2.7.3.6. RCRA Corrective Action**

PPG (Y/N): Y

For Resource Conservation and Recovery Act (RCRA) Government Performance and Review Act (GPRA) Corrective Action universe, IDEM will provide U.S. EPA Region 5 quarterly updates for meeting Environmental Indicator forms CA 725 and CA 750 activities and continue to coordinate and communicate with Region 5 on progress at non-GPRA Corrective Action sites.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
Dana Corp/BRC Rubber Group met the Environmental Indicator CA750 on September 5, 2003. Migration of contaminated groundwater is under control. After the initial groundwater investigation, results indicated that the groundwater had not been impacted. The human exposure is pending remediation of PCB release through the surface waters prior to 1974. The soil affected goes off-site through a wetland-like area. Remediation should occur during the next year.

**2.7.3.7. Immediate Removals**

PPG (Y/N): N

Stabilize and mitigate immediate threats to human health and the environment.

By: 6/30/04 and 6/30/05

Percent Complete  
70%

Status:  
Working in cooperation with Solid Waste, approximately twenty (20) waste tire inspections were conducted between January 1 and March 31, 2004. There are a total of thirty (30) facilities.

Respond to 100% of the immediate removal requests within five (5) days of referral.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
All activities were completed within five (5) days of referral.

Refer to U.S. EPA Region 5 Emergency Response Section and partner on those sites exceeding IDEM's resources.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Three (3) new sites were referred to USEPA between January 1 and June 30, 2004 (Former Gatke Dump, Commerce Road Traylor site, Calumet River mystery spill).  
Two sites have been referred since July 1, 2003.

### 2.7.3.8. Management of Remedial Response sites

PPG (Y/N): N

Evaluate 100% of all new sites referred to Remedial Response from Emergency Response to determine whether long term oversight is required and to establish priority.

By: 6/30/04 and 6/30/05

Percent Complete  
100%

Status:

State Cleanup currently has 450 active remedial response sites. Initial actions have been taken on all sites.

Issue fifty (50) no further action letters on sites that have completed all necessary response activities per fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
38%

Status:

Nineteen (19) no further action letters have been issued since July 1, 2003.

### 2.7.3.9. Leaking Underground Storage Tank (LUST)s

PPG (Y/N): N

Ensure mitigation, remediation and closure of Leaking Underground Storage Tank (LUST) sites.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:

Ongoing activity - see information below for measures.

Approve two hundred and fifty (250) site characterizations each fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
68%

Status:

169 approved.

Approve two hundred and fifty (250) corrective action plans each fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
84%Status:  
209 approved.

Approve two hundred and fifty (250) closures.

By: 6/30/04

Percent Complete  
100%Status:  
425 approved.

Approve three hundred (300) closures.

By: 6/30/05

Percent Complete  
NAStatus:  
Nothing to report until FY 2005.**2.7.3.10. Voluntary Remediation**

PPG (Y/N): N

Increase participation into the Voluntary Remediation Program by fifty (50) sites each fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
74%Status:  
The Voluntary Remediation Program accepted 37 new applications so far in FY 2004.**2.7.3.11. Cost Recovery**

PPG (Y/N): N

Support the evaluation of current cost recovery efforts and provide recommendations to senior management.

By: 6/30/04 and 6/30/05

Percent Complete  
25%Status:  
OLQ has cost recovered a total of \$54,637.32 from State Cleanup Program sites as of December 30, 2003.**2.7.4. Permits Branch Priorities**

Tom Linson, Branch Chief, (317) 232-3292, e-mail: tlinson@dem.state.in.us

**2.7.4.1. Hazardous Waste Permitting**

PPG (Y/N): Y

Complete twelve (12) hazardous waste facility permitting actions per fiscal year, in accordance with the annual work plan. Two (2) of the permitting actions will address GPRA first-time post closure enforceable instruments, while one (1) will address first-time full facility permits. Permits will be issued in accordance with the process specified by hazardous waste management regulations and applicable non-rule guidance. Each permit issued will address corrective action requirements. Sites subject to corrective action that are not addressed by permit will be covered by an order in accordance with annual work plan schedules.

By: 6/30/04 and 6/30/05

Percent Complete  
100%  
Status:  
Goal met for 2004

An annual work plan will be provided to U.S. EPA Region 5 EnPPA coordinator for state fiscal year 03-04 and state fiscal year 04-05.

By: 6/30/04 and 6/30/05

Percent Complete  
100%  
Status:  
FY 2004 Permitting Action Schedule forwarded to U.S. EPA Region 5.

For Resource Conservation and Recovery Act (RCRA) Corrective Action meet RCRA CA/GPRA commitments.

By: 6/30/04 and 6/30/05

Percent Complete  
66%  
Status:  
Completed Environmental Indicator 725 and 750 for U.S. Army Newport on schedule.  
Environmental Indicator 750 for Alcoa Warrick remains pending.

#### 2.7.4.2. Hazardous Waste Closures

PPG (Y/N): Y

Approve twelve (12) hazardous waste closure plans/certifications per fiscal year. Closure plans will be approved in accordance with hazardous waste management regulations and applicable non-rule guidance.

By: 6/30/04 and 6/30/05

Percent Complete  
100%  
Status:  
Goal met for 2004

#### 2.7.5. Compliance and Response Branch Priorities

Bruce Kizer, Branch Chief, (317)308-3104, e-mail: bkizer@dem.state.in.us

### 2.7.5.1. Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Treatment, Storage, and Disposal facilities (TSD's)

PPG (Y/N): N

EPA Role: Conduct inspections at three State and local installations and at three Federal facilities. In addition, Region 5 will independently inspect the boiler and industrial furnace units at five TSDs. Eight IDEM/Region 5 joint inspections will be conducted at installations within U.S. EPA's national priority sectors which handle certain commercial and/or industrial wastes in ways that illegally evade RCRA requirement for permits. Other IDEM/Region 5 joint inspections will be conducted at five TSDs and one LQG.

Each fiscal year, IDEM will inspect all Treatment, Storage, and Disposal facilities (TSD's) with a current operating permit for active permitted units.

By: 6/30/04 and 6/30/05

Percent Complete  
100%

Status:  
All 22 operating TSD's have been inspected. EPA has clarified that annual inspections are only required at operating, permitted Treatment, Storage, and Disposal facilities.

### 2.7.5.2. Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Generators

PPG (Y/N): Y

Annually, IDEM will inspect at least 20% of the large quantity generator universe that exists as of June 1 of that respective year, as identified in the EPA RCRAInfo database. Annually, IDEM will inspect at least 10% of the small quantity generator universe that exists as of June 1 of that respective year, as identified in the EPA RCRAInfo database.

By: 6/30/04 and 6/30/05

Percent Complete  
100%

Status:  
At the beginning for FY04, RCRAInfo indicated there were approximately 571 Large Quantity Generators (LQG's) and 2275 Small Quantity Generators (SQG's). During FY04, IDEM inspected approximately 181 LQG's (31% of the universe), and 299 SQG's (13% of the universe).

### 2.7.5.3. Resource Conservation and Recovery Act (RCRA) Hazardous Waste Inspections of Newport Chemical Depot

PPG (Y/N): N

IDEM will conduct RCRA inspections at the Newport Chemical Depot. IDEM anticipates conducting a diligent compliance oversight program of the VX neutralization project at the Newport facility. The resource commitment is expected to be significant. Inspections will be conducted by an experienced team at a frequency which provides assurance that activities are protective of human health and the environment, and may include daily inspections if necessary. To safely and successfully implement this program, staff will complete additional medical screening, security screening, and training requirements.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
Startup of neutralization process has been delayed. 100% of necessary medical and security screenings for FY 2004 have been conducted. Training has occurred and is ongoing. Inspections are ongoing.

#### 2.7.5.4. Underground Storage Tank (UST) Inspections

PPG (Y/N): N

Conduct 1,000 Underground Storage Tank (UST) inspections of regulated facilities each fiscal year for a total of 2,000 inspections.

By: 6/30/04 and 6/30/05

Percent Complete  
83%

Status:  
838 inspections completed. Inspection capacity reduced by 40% due to staff attrition.

Work to ensure all new and unregistered tanks are properly registered.

By: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
Ongoing activity. Lost 100% staffing for this activity in third & fourth quarter.

Complete and submit to U.S. EPA Region 5 the Underground Storage Tank (UST) Semi-annual Performance Measures Report (STARS). The report will be submitted in October and April each fiscal year.

By: 4/30/04 and 4/30/05

Percent Complete  
100%

Status:  
October report sent to EPA Region 5 10/15/03. April report sent 4/1/04.

Complete and submit to Region 5 the report Significant Operational Compliance UST Performance Measures Matrix. This report will be submitted in October and April of each fiscal year.

By: 4/30/04 and 4/30/05

Percent Complete  
100%

Status:  
April report sent to EPA Region 5 4/15/04.

#### 2.7.5.5. Confined Feeding Operation Inspections

PPG (Y/N): N

IDEM will conduct comprehensive inspections of at least 20% of Concentrated Animal Feeding Operations (CAFO's) each fiscal year. In addition to the 20% of CAFO's, inspections will be conducted at confined feeding operations (state permitted sites) in response to complaints and any new construction sites. The inspections include operational requirements and nutrient management requirements for land application.

By: 6/30/04 and 6/30/05

C

The implementation of National Pollutant Discharge Elimination System (NPDES) program at Concentrated Animal Feeding Operations (CAFOs) will be evaluated during FY 2004.

By: 6/30/04

Percent Complete  
60%

Status:  
Currently working on finishing COPs and internal training for inspectors.

Participate with EPA Region 5 in the Multi-State/Federal investigation of Vreba-Hoff Dairy Development animal feeding operations.

Percent Complete  
100%

Status:  
EPA is compiling the information on the inspections for the investigation.

Work with EPA Region 5 to develop and implement a Concentrated Animal Feeding Operation Inspection Check List (to be incorporated in the States Inspections). Check lists need to be developed to determine if a facility is a CAFO requiring an NPDES permit and also the check compliance with NPDES permit requirements.

Percent Complete  
60%

Status:  
Currently working on finishing the inspection report along with the COP.

#### 2.7.5.6. CFO Construction Inspections

PPG (Y/N): N

IDEM will conduct construction inspections at 100% of all Concentrated Feeding Operation (CFO) construction sites based on their start of construction notification during each fiscal year.

By: 6/30/04 and 6/30/05

Percent Complete  
100%

Status:  
Staff have completed 112 construction inspections for CFO's.

#### 2.7.5.7. PCB Inspections

PPG (Y/N): Y

IDEM will conduct 38 PCB inspections during FY 2004 and 38 PCB inspections during FY 2005. Results of PCB inspections are forwarded to EPA for the appropriate action.

By: 6/30/04 and 6/30/05

Percent Complete

100%

Status:

There were 38 inspections have been conducted by March 2004.

#### **2.7.5.8. Compliance/Enforcement Team**

PPG (Y/N): N

Participate in the agency-wide Compliance/Enforcement Team to communicate activities, evaluate information and formulate agency-wide strategies and resource allocation.

By: 6/30/04 and 6/30/05

Percent Complete

50%

Status:

OLQ participation is ongoing.

#### **2.7.5.9. Emergency Response**

PPG (Y/N): N

Participate in developing and updating multi-agency counter-terrorism response plans and all hazards plans. (Indiana State Agency Comprehensive Emergency Management Plan (CEMP), U.S. EPA Area Contingency Plans for Indianapolis and Louisville, Board of Animal Health Foreign Animal Disease Plan, Indiana Continuity of Government Plan)

During: FY 2003 – 2005

Percent Complete

50%

Status:

Emergency Response participation is ongoing.

Contribute to the design and participate in local, state, and federal counter-terrorism and hazmat response and recovery exercises. (Chemical Stockpile Emergency Preparedness Plan (CSEPP (VX)), Operation River City (Louisville), Hoosier Guardian, Local Emergency Planning Committee exercises, Pipeline Group tabletops)

During: FY 2003 – 2005

Percent Complete

50%

Status:

Emergency Response participation is ongoing.

Participate in multi-agency counter-terrorism and hazmat response forums (Counter-Terrorism and Security Council, Safe Schools Advisory Council, Purdue University Homeland Security Institute, U.S. EPA Region 5 Regional Response Team.)



During: FY 2003 – 2005

Percent Complete  
50%

Status:  
Emergency Response participation is ongoing.

Provide staff and support to the Indiana Emergency Response Commission

During: FY 2003 – 2005

Percent Complete  
50%

Status:  
Emergency Response participation is ongoing.

Provide after hour's duty roster of IDEM staff to State Emergency Management Agency (SEMA) for staffing SEMA's Emergency Operations Center.

During: FY 2003 – 2005

Percent Complete  
50%

Status:  
Emergency Response participation is ongoing.

Participate in State Emergency Management Agency advisory committee regarding Federal Emergency Management Agency and Department of Justice counter-terrorism grants.

During: FY 2003 – 2005

Percent Complete  
50%

Status:  
Emergency Response participation is ongoing.

## 2.7.6. Science Services Branch Priorities

Laura Steadham, Branch Chief, (317)232-8866, e-mail: lsteadham@dem.state.in.us

### 2.7.6.1. Great Lakes Initiative (GLI)

PPG (Y/N): Y

Provide technical and mapping support for IDEM Remedial Action Plan activities in the Area of Concern (AOC) through the following activities.

Develop an annual IDEM Great Lakes Initiative Strategic Plan by May 1 of each fiscal year.

By: 5/1/04 and May 1, 2005

Percent Complete  
100%

Status:  
Planning for FY2005 is complete.

Provide technical and financial support to non-governmental organizations, state and local government entities, federal agencies, research institutions, and other non-IDEM cooperators

working to improve the environmental quality in the Area of Concern (AOC) and the Great Lakes Drainage Basin in Indiana.

Ongoing

Percent Complete  
10%

Status:

The projects to be funded for FY2004 have been chosen, and drafts of the contracts for those projects have been completed. Due to lack of internal contracting resources, we will not be able to issue any contracts for the FFY04 grant. The projects selected for 2004 will be carried over to FFY2005.

Provide technical and financial support for IDEM offices and initiatives working to improve the environmental quality in the Area of Concern (AOC) and the Great Lakes Drainage Basin in Indiana.

Ongoing

Percent Complete  
100%

Status:

Software purchases are complete. We are in the process of purchasing USB-based Global Positioning System (GPS) receivers to test for future field data collection activities. The USB GPS receivers are 90% less expensive than the GPS receivers that we have purchased in the past, and if testing shows them to be sufficient to meet our needs, it will greatly reduce our GPS data collection costs.

Prepare and present to EPA an annual report on Great Lakes Initiative activities for each fiscal year.

By: 12/1/04 and 12/1/05

Percent Complete  
0%

Status:

The 2004 report will be written after the close of FY 04.

#### 2.7.6.2. RCRA Info

PPG (Y/N): Y

Resource Conservation and Recovery Act (RCRA) information will be input into the RCRA Info database on a monthly basis.

By: Monthly

Percent Complete  
50%

Status:

Data being input into RCRA Info database on a monthly basis.

IDEM will post RCRA Info data to the IDEM National Environmental Information Exchange Node (NEIEN) upon completion of the IDEM Node.

By: November 2005

Percent Complete  
0%

Status:  
Awaiting completion of IDEM's National Environmental Information Exchange node and the availability of funding to develop the data flow.

IDEM will modernize the Agency's RCRA Info system / Indiana RCRA Activity Tracking System (IRATS) to be compliant with the Facility Information Template for States II (FITSII) and the Indiana Facility Registry System (IFRS) by June 30, 2006 provided that adequate funding is available.

By: 6/30/06

Percent Complete  
0%

Status:  
We are looking for funding sources for this project.

### 2.7.7. Rules, Planning and Outreach Section Priorities

Mike Dalton, Section Chief, (317)232-8884, e-mail: mdalton@dem.state.in.us

#### 2.7.7.1. Rule Development

PPG (Y/N): Y

IDEM will promulgate and pursue authorization for all RCRA subtitle C and I rules.

During: FY 2003 - 2005

Percent Complete  
80%

Status:  
Indiana was authorized for ARA 19 in April 2004. ARA 20 will be submitted within six (6) months of filing of final rule with the Secretary of State. The 2003 Hazardous Waste update was preliminary adopted in May 2004. Subtitle I authorization is pending.

Develop equivalent legislation, regulations and program revision applications for RCRA and Hazardous and Solid Waste amendments (HSWA) / non-HSWA provisions for which the state is prepared to seek authorization and submit current and future authorization packages with in a mutually agreed upon time frame.

By: EPA and IDEM mutually agreed upon time frame.

Percent Complete  
35%

Status:  
The 2003 Update first notice was continued and it will be second noticed in May 2004.

## 2.8. Office of Legal Counsel

The Office of Legal Counsel (OLC) provides legal advice and representation to the Department of Environmental Management (IDEM). Most of the attorneys working in OLC are environmental law specialists, though some of the attorneys also specialize in contract and employment law in order to fully represent the legal needs of IDEM. (Statutory Authority IC 13-13-3-3)

### Office Contact

Linda Runkle  
Assistant Commissioner  
Office of Legal Counsel  
(317) 233-5546  
e-mail: [lrunkle@dem.state.in.us](mailto:lrunkle@dem.state.in.us)

OLC is divided into five functional sections: Program Counsel, Rules and Legislation, Enforcement, Remediation and Litigation. Each attorney and many of the office's support staff are assigned to work in one of these five sections. Each section has a supervising attorney (Section Chief) who manages the responsibilities of the section.

### 2.8.1. Agency Priorities

#### 2.8.1.1. Improve Rulemaking Process

Lead Office:  
OPPP/OLC

Evaluate administrative, rule writing, publication, programmatic and external aspects of rulemaking and make recommendations for revisions to current organization and management of rulemaking.

Complete evaluation

By: 10/1/03

Percent Complete  
90%

#### Status:

Evaluation is complete. Formulation of recommendation on suggested changes was pending until the Environmental Quality Service Council (EQSC) completed discussions on rulemaking. EQSC recommendations were to not amend agency rulemaking statutes and allow agency to implement recommended changes to rulemaking process and board interaction. Internal evaluation of rulemaking process continues; recommendations for internal process changes are forthcoming.

Participate in EQSC Discussions related to rulemaking. Implement recommendations approved by Commissioner.

By: 12/1/03

Percent Complete  
100%

#### Status:

The Environmental Quality Service Council (EQSC) has concluded discussion of this issue with recommendation that no further legislative action is necessary at this time.

#### 2.8.1.2. Rulemaking Activities

Adjust rules review services and interface with programs on rulemaking activities as necessary, based on legislative or managerial review of rulemaking process changes, duties and functions of agency.

By: 1/31/04

Percent Complete

85%

Status:

No anticipated process changes in next legislative session. Those required from '03 session have been implemented. Internal review of process changes to rulemaking continues.

Develop process manual for all rulemaking boards, in cooperation with board members and board counsels.

By: 1/31/04

Percent Complete

75%

Status:

First draft complete; final draft in progress.

Revise rulemaking templates used by program rule writers for publication of rules in Indiana Register and preparation of board packets. (Revisions would reflect evolution of the information required to be provided in the documents.)

By: 6/30/04

Percent Complete

90%

Status:

Templates have been updated, as have board packets. Reviewing to determine if additional process changes are necessary. Additional changes will depend upon process changes made throughout agency.

Develop coordination program to inform other attorneys with Office of Legal Counsel of pending rulemaking actions.

By: 1/31/04

Percent Complete

75%

Status:

Cross-function media meetings taking place for work related to water rules. Developing rules information in conjunction with new rules web page. New rules web page is complete and running. The site includes all ongoing rulemakings and information related to workgroups.

## 2.9. Office of Management, Budget, and Administration

### 2.9.1. Office of Fiscal Policy and Accounting

The Office of Fiscal Policy and Accounting is responsible for establishing fiscal policy, oversight of financial operations, and the processing of financial instruments.

The office is comprised of three sections: Billing and Accounts Receivable, Accounts Payable, and Financial Oversight and Reporting. The Billing and Accounts

Receivable area is primarily responsible for producing invoices, depositing all revenue, and assisting in the agency's cost recovery efforts. The Accounts Payable section is responsible for making the payment of invoices by ensuring that all state laws and regulations for making payments are adhered to, and that all documentation is in proper order. The Financial Oversight and Reporting section is primarily responsible for reviewing and analyzing the status of all agency accounts for the program areas of the agency, and ensuring that payments are being charged to the appropriate account or grant.

#### Office Contact:

Controller - Vacant  
Office of Fiscal and Accounting  
(317) 233

e-mail: @dem.state.in.us

#### 2.9.1.1. Agency Priorities

##### 2.9.1.1.1. Study Financial Management Information System

Study all currently available modules and features of the Peoplesoft® Financial Management System to determine if additional capabilities can result in greater efficiencies for IDEM processes.

By: 4/1/04

Percent Complete

0%

Status:

Unable to complete. Through the upgrade process, we know of only one module that has not been purchased by the state and is not currently in use by IDEM. We must wait for the GMIS section of the Department of Administration to release study the Time and Labor module to us before we can begin to evaluate it. This is not scheduled until FY 06.

Report on the results of the study and make recommendations to senior staff on any additional features that should be further pursued.

By: 6/1/04

Percent Complete

0%

Status:

Unable to complete.

Develop an implementation proposal for any features that were recommended for implementation. This proposal will include any changes to current business practices that will be needed to implement the additional features of Peoplesoft®.

By: 9/1/04

Percent Complete

0%

Status:  
Unable to complete.

Present any implementation proposals to senior staff and begin the implementation process for any proposals that are approved.

By: 10/1/04

Percent Complete  
0%  
  
Status:  
Unable to complete.

### 2.9.1.2. Office Priorities

#### 2.9.1.2.1.

PPG (Y/N): N

#### **Grant Management**

EPA Role:

- 1.) Assist in gathering information for study, and providing some training for the positions designated as having grant oversight responsibilities in IDEM.
- 2.) Coordinate with IDEM to determine cooperative methods to improve the grant submittal process.
- 3.) Work with IDEM to improve the cash management system.

Study the current grant oversight and training processes in IDEM and develop a report on the processes including any recommended changes.

By: 1/1/04

Percent Complete  
80%  
  
Status:  
We have studied the current grant oversight materials and developed a questionnaire to give to the various sections of the agency involved in the grant process. The questionnaire has been returned. The feedback from the survey will be analyzed and a report prepared.

Develop a proposal to address any weaknesses in the current system as identified by the report.

By: 4/1/04

Percent Complete  
0%  
  
Status:  
Waiting on the previous step to be completed.

Evaluate the proposals and decide which proposals can be implemented without outside assistance. Begin implementing all proposals that do not rely on outside assistance, and begin to work with external shareholders to implement those proposals which will require outside assistance.

By: 7/1/04

Percent Complete  
0%

Status:  
Waiting on the previous step to be completed.

**2.9.1.2.2.**

PPG (Y/N): N

**Minority Business Enterprise (MBE) / Women's Business Enterprise (WBE) Audit**

EPA Role: Assist in gathering information for study, and providing some training for the positions designated as having grant oversight responsibilities in IDEM.

Review the current Minority Business Enterprise (MBE) / Women's Business Enterprise (WBE) reporting system for the agency.

By: 1/1/04

Percent Complete  
100%

Status:  
We have recently received new proposed rules for MBE/WBE reporting from EPA and are assessing how best to address them. We have also developed a questionnaire to send to the various sections of the agency that deal with MBE/WBE reporting to serve as the basis for our report. The questionnaire was distributed and has been received back by Accounting.

Issue a report detailing the strengths and weaknesses of the current reporting system.

By: 2/1/04

Percent Complete  
0%

Status:  
Waiting on the previous step to be completed.

Develop a proposal to address the weaknesses of the current system.

By: 4/1/04

Percent Complete  
0%

Status:  
Waiting on the previous step to be completed.

Begin to implement all aspects of the proposal that will not require outside assistance, and begin to work with outside shareholders to implement any aspects of the proposal that require outside assistance.

By: 7/1/04

Percent Complete  
0%

Status:  
Waiting on the previous step to be completed.



## 2.9.2. Human Resources Management Office

The Human Resources Management Office provides services to IDEM staff in the areas of Employment and Recruiting, Equal Employment Opportunity, Employee and Labor Relations, Compensation, Benefits, Training and Development. Our mission is to provide quality customer service as it relates to each Human Resource function and to take positive steps toward ensuring the organization's success while closely following applicable state and federal employment law.

### Office Contact

Brandye Hendrickson, Director  
Human Resources Management Office  
100 N. Senate Ave. N1322  
Indianapolis, IN 46206  
(317) 233-1785  
[bhendric@dem.state.in.us](mailto:bhendric@dem.state.in.us)

### 2.9.2.1. Agency Priorities

#### 2.9.2.1.1.

#### ***Building a Better IDEM – Workforce Development – Focus on Supporting our Workforce***

Facilitate management panel discussions/focus groups to encourage management participation: As new policies are developed, Human Resources will solicit input from managers.

By: 12/31/03

Percent Complete

50%

Status:

Ongoing. Continue to attend section/branch/program meetings to get input on proposed policies and procedures.

**Hold employee sounding sessions and manage open forums:** As new policies and procedures are distributed, Human Resources will hold sounding sessions and open forums where information can be exchanged and questions can be answered.

By: 12/31/03

Percent Complete

50%

Status:

Ongoing. Have held open forums to answer questions and get input on the revised performance appraisal system, Arrests and Convictions/Background Checks Policies and Telework Policy. Solicited input from Branch Chiefs on Leadership Development series and from Engineer supervisors on Engineer recruitment and retention.

#### 2.9.2.1.2.

#### ***Building a Better IDEM – Workforce Development – Research Options for Conducting “360-Degree” Evaluations***

Human Resources will research available software, other agencies' procedures and ways to give effective feedback to supervisors.

By: 6/30/04

Percent Complete

100%

Status:

Plan to utilize Kouzes and Posner model for evaluation. Hope to advertise availability and discuss at upcoming Sr. Staff meeting and Agency Branch Chief meeting.

**2.9.2.1.3.*****Building a Better IDEM – Workforce Development – Succession Planning***

**Develop internal leadership training:** Human Resources will research and provide options to Senior Staff for leadership training.

Options researched by 12/31/03 First session held by 12/31/04

Percent Complete  
50%

Status:

Research has been completed. Training has been developed, scheduled and one session has been conducted. First series to be completed by 12/04.

Develop knowledge retention system to deal with employee turnover and retirement:

Human Resources will develop a tool for supervisors to help capture the patterns, processes and skills of high performing employees to prevent loss of valuable knowledge upon resignation or retirement.

Tool developed

By: 6/30/04

Percent Complete  
100%

Status:

Will encourage Branch Chiefs and other supervisors to create job descriptions and/or standard operating procedures for all positions. Higher level management could incorporate this requirement into supervisor's position descriptions or include in other office priorities.

**2.9.2.1.4.*****Building a Better IDEM – Communication Training***

Human Resources will assist MACS with the scheduling of training classrooms and material, and will maintain attendance rosters. Human Resources will also incorporate the training in the Quarterly Training Calendar.

Ongoing through 8/1/04

Percent Complete  
100%

Status:

Training has been developed and conducted.

**2.9.2.1.5.*****Building a Better IDEM - Implement any potential organizational changes to enhance efficiencies***

Human Resources will work with program areas to review organizational structures and provide guidance on potential reorganization packages.

Guidance accessible:

By 12/31/03

Percent Complete  
100%

Status:

As potential reorganization packages are created, Human Resources provides guidance on components and structures and serves as the liaison between State Personnel, State Budget Agency and IDEM.

**2.9.2.1.6.**

***Coalition Building – Partnering with universities on research and technical issues - Establish Industrial Pollution Prevention Internships***

Human Resources and Office of Pollution Prevention and Technical Assistance will work together to consider the development of an internship program with Office of Pollution Prevention and Technical Assistance/Clean Manufacturing Technology Institute. Work with Clean manufacturing Technology Institute to evaluate the possibility of a college pollution prevention internship program. This program would allow engineering students to assess participating facilities for pollution prevention opportunities.

By: 6/30/04

Percent Complete  
100%

Status:

The Office Pollution Prevention Technical Assistance (OPPTA) has met with Human Resources to discuss the possibility of P2 Internships. The resulting discussions found that if no federal grant is received for the program, interns would be hired as "Unpaid Interns". OPPTA did apply for and secure a summer intern with the Governor's Intern Program. This intern worked within OPPTA to assist in planning the Annual P2 Conference and also researched P2 Training Materials for Agency Staff.

Further research and discussions have been held with the Clean Manufacturing Technology Institute (CMTI) to determine feasibility of an on-going P2 internship program. CMTI is interested in pursuing this opportunity and has been working with OPPTA to research other state P2 Internship programs. Human Resources contacted Purdue University to determine the interest in an "Unpaid Intern" program with their School of Engineering. There is an interest from Purdue for unpaid interns.

IDEM is therefore interested in pursuing this further and will consider applying for a PPIS grant to fund this project for the first 2 years and work with another entity such as CMTI or the Purdue University Advanced Technology Center to fully implement and provide on-going management and funding of a P2 intern program.

### 2.9.3. Office of Business Services

The Division of Business Services encompasses a wide range of specialty services for the Indiana Department of Environmental Management.

The offices included in this division are:

- Information Technology,
- Administrative Services,
- Distribution, Purchasing, and
- Contracts Administration.

#### Office Contact

Laurie Beamish

Director  
Business Services Division

(317) 232-7010

e-mail: [lbeamish@dem.state.in.us](mailto:lbeamish@dem.state.in.us)

These offices are critical to the daily internal operations of IDEM. As the agency grows, and during expansion into regions of Indiana, these offices are responsible for all communication functions, and purchasing goods and services via procurement or contractual methods. In addition, staff are dedicated to making offices functional and comfortable for employees and the public.

### 2.9.3.1. Agency Priorities

#### 2.9.3.1.1.

#### **Centralized Web Development**

**Goal:** Centralize Web site development/maintenance to integrate program area web pages. This will require the creation of a Web Technical Team.

Percent Complete

100%

Status:

Team has been established effective June 1 all new or changed web pages are published by web team.

#### 2.9.3.1.2.

#### **Improve management of environmental data, and build foundation for future data integration efforts:**

#### **Indiana Facility Registry System (I-FRS)**

- Geography Network
- Document Management System (DMS)
- Other Office/Data Specific integration efforts

EPA Role: Region 5 will assist IDEM in applying for Challenge grants.

OMBA - BSD: Co-lead on this priority with Office of Planning and Assessment, and provide Information Technology consultants to guide database development. Provides ongoing assistance and review on development of standards, standard operating procedures, and process that pertain to the Data Management Team and to agency data management.

### **Agency Data Integration / Data Management Team**

Continue efforts of the Data Management Team. The Team ensures that new and enhanced data integration projects are consistent with guiding data management policies. The team also develops and, throughout their office, proactively implements standards pertaining to data management. Continue to provide policies, standards, procedures, and guidance for data management practices.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

Team has worked on two major proposals (I-FRS & OAQ ACES) and is working to revise Data Management Guide. We were demonstrated the finished I-FRS database and the ArcIMS GIS Wellhead Internet application. Phase 2 of I-FRS has started. Received NEIEN implementation grant for linking GIS data to I-FRS and creating the electronic discharge monitoring report data system.

### **Establish Indiana Facility Registry System (I-FRS):**

Provide IT project management, support, and application development.

Staff from the Office of Management and Budget Administration (OMBA) Information Technology section and the Office of Planning and Assessment (OPA) will oversee development of, and will implement the Indiana Facility Registry System (I-FRS) to facilitate the exchange of facility data between IDEM and EPA and promote quality environmental data.

By: 6/30/05

Percent Complete  
50%

Status:

The first phase of Indiana Facility Registry System (I-FRS) has been completed. Phase 2 to link I-FRS with current applications using facilities has begun. Underground Leaking, Community Right to Know and Emergency Response System (ULCERS) is first database to be linked.

### **Geography Network**

OMBA - BSD: Priority lead. Project coordination. Participate in development of metadata development plan and implement Web Based service.

Each Office will inventory existing Geographic Information System (GIS) data.

By: 6/30/03

Percent Complete  
100%

Status:

Inventory obtained through GIS Tech Workgroup Reps.

Agency Geographic Information System (GIS) Coordinators, with assistance and input from Agency GIS Tech Workgroup composed of Office GIS data Contacts, will develop plan for creating metadata for program developed data.

By: 10/1/03

Percent Complete  
100%

Status:

Policy reviewed and recommended by GIS Tech Workgroup. The recommended policy was presented to the Data Management Team (DMT) and approved in the December meeting.

Information Technology Geographic Information System (GIS) staff will develop Geography Network service on IDEM Intranet ArcIMS Server.

By: 12/31/03

Percent Complete  
75%

Status:  
Client updates and SDE updates completed. Geography Network development is ongoing.

IDEM Geography Network made available to State Government Network.

By: 3/31/04

Percent Complete  
100%

Status:  
As data is being added to the system it is being made available to internal and external users. URL=<http://demweb1/metadataexplorer/explorer.jsp>

### **Document Management System (DMS)**

Deploy DMS in 25% of the Agency

By: 8/31/03

Percent Complete  
100%

Status:  
over 25% of the agency has been trained.

Deploy Document Management System in 50% of the Agency

By: 1/31/04

Percent Complete  
58% of offices or sections have been trained on DMS.

Status:  
Working with OLC to start adding libraries; lack of training room space has been largest obstacle; now that PeopleSoft training is complete we can progress quicker. Also we are demonstrated DMS capabilities to Enforcement staff on 2/5/04

Deploy Document Management System in 75% of the Agency

By: 8/31/04

Percent Complete  
0%

Status:  
OMBA/OE/OLC are up next.

Deploy Document Management System in 100% of the Agency

By: 12/31/04

Percent Complete  
0%

Status:  
Outside current time frame.

**Focus on records management issues to include record retention schedules.**

Develop and implement a retention schedule and agency policy for the electronic filing of e-mails. This will assist with reducing the time and effort currently expended for Public Information requests as well as court requests for e-mail.

Develop record retention policy (including e-mails and electronic documents)

By: 12/31/03

Percent Complete  
90%

Status:

Draft policy has been created; Indiana Commission on Public records (ICPR) has also issued some guidance; draft was provided to Sr. staff for review; will be adjusting it to reflect comments. With Office of Legal Counsel we are drafting a policy and GroupWise curriculum to educate staff on how to follow policy and use GroupWise. Policy needs to go back for Sr. Staff review.

### 2.9.3.2. Office Priorities

#### 2.9.3.2.1.

PPG (Y/N): N

#### ***Update the Shadeland Network***

Due to bandwidth demands for Geographical Information Systems (GIS) and other environmental application systems, our Local Area Network (LAN) located at our Shadeland Avenue site needs to be upgraded. The move from hubs to switches will increase the bandwidth available to staff and will allow them to access and process data at that site as well as at our Indiana Government Center site quickly. This will also allow us to leverage the investments made in processors, switches and storage (SAN).

Upgrade completed.

By: 12/1/04

Percent Complete

25%

Status:

DoIT has been given the OK to proceed; some materials have been received waiting for equipment delivery to schedule installation.

#### 2.9.3.2.2.

#### ***Replace Outdated Vehicles***

EPA Role: Funding under PPG.

Over 25% of our vehicle fleet have over 100,000 miles on them. The agency will attempt to replace approximately half of the vehicles over 100,000 miles. This will help to eliminate expensive maintenance on these well worn vehicles as well as ensure staff are traveling in reliable vehicles.

By: 6/30/04

Percent Complete

100%

Status:

All requisitions have been processed and Purchase Orders issued to vendors. We are now beginning to receive vehicles.



## 2.10. Office of Media and Communications Services

IDEM's Media and Communications Services (MACS) fulfills the agency's commitment to provide accurate, current and timely information to our internal and external customers.

Responsibilities are divided into two working groups: Media and Communications.

### Office Contact(s):

Mark Amick  
Office of Media and Communications  
Services  
233-0700  
e-mail: [mamick@dem.state.in.us](mailto:mamick@dem.state.in.us)

The Media Group works with reporters from newspapers, television, radio stations and trade publications to provide timely and factual environmental information.

The Communications Group includes both print and electronic publications, which the agency produces in-house. This group also has the primary responsibility for the agency's Web site portal.

MACS serves program areas by communicating policy, environmental requirements, information, decisions, and pertinent news to the public through publications, electronic information services, news conferences, speaking engagements and special events. MACS also distributes information internally to inform and educate IDEM employees about environmental issues and initiatives that affect their jobs and daily lives as residents of Indiana.

### 2.10.1. Agency Priorities

#### 2.10.1.1.

#### Building a Better IDEM – Succession Planning – Communication Training

### Communication Training

Establish a media plan for emergency management and crisis communications to enable the agency to efficiently and effectively respond to the news media in the event of an environmental crisis. Identify IDEM crisis communication message themes and strategies for quickly responding to reporters; assign appropriate senior staff and management crisis team personnel.

By: 9/1/03

Percent Complete  
100%

#### Status:

MACS Media Handbook is complete with all related crisis communication themes. Media training began in January and was provided to all of Senior Staff, Branch Chiefs, and staff at all three regional offices. Periodic training sessions have been offered to all agency staff, and the presentation has been provided to all staff electronically. Training will continue to be offered throughout the year.

Identify IDEM crisis communication message themes and strategies for quickly responding to reporters; assign appropriate senior staff and management crisis team personnel.

By: 9/1/03

Percent Complete  
100%

Status:  
Information is complete, contained in the MACS Media Handbook, and Public Information Officers (PIOs) have been appropriately trained. Training and continued education through internal meetings is ongoing.

#### Complete and distribute crisis plan

By: 12/1/03

Percent Complete  
100%

Status:  
Crisis plan is complete and contained in MACS Media Handbook. Handbook is available to staff electronically.

Review crisis team personnel list every six months and update as necessary.

#### **Create scenario-driven media training plan to prepare IDEM officials for conducting interviews with members of the news media; train for appropriate agency staff.**

Complete media training plan.

By: 9/1/03

Percent Complete  
100%

Status:  
Information is complete and contained in the MACS Media Handbook.

Train 100% of senior staff.

By: 1/1/04

Percent Complete  
100%

Status:  
Media training has been provided to all senior staff.

Train 75% of agency branch chiefs.

By: 4/1/04

Percent Complete  
100%

Status:  
Media training has been provided to all branch chiefs.

Work with IDEM Human Resources to make media training course available to all appropriate IDEM managers on the Quarterly Training Calendar. Provide public speaking training to appropriate agency staff. Train 50% of speaker's bureau personnel.

By: 9/1/04

Percent Complete  
100%

Status:  
Training has been developed and is available to appropriate IDEM staff.

### **2.10.1.2. Building a Better IDEM – Centralized Web Development**

Lead Office:  
MACS/OMBA-  
BSD

Centralize Web site development/maintenance to integrate program area web pages. This will require the creation of a Web Technical Team. The team will work in concert with Office of Management and Budget Administration – Information Technology staff to ensure that pages are brought to USC § 508 compliance standards.

Create a centralized Web development and management team with defined standard operating procedures and expectations.

By: 6/1/04

Percent Complete  
100%

Status:  
Four positions have been established and filled. Standard operating procedures and agency standards have been established.

Realign agency Web site to re-evaluate and re-organize information by removing old information, updating Web pages and restructuring information to increase external customers' ease of use and navigability.

By: 6/1/05

Percent Complete  
50%

Status:  
The agency rules Web site is 100% complete and was made public March 10, 2004. Additional areas to focus on are now being identified.

Create a location for internal customers and populate with information and guidance documents.

By: 12/31/04

Percent Complete  
0%

Status:  
Waiting for state information portal change. This will allow creation of special locations/pages for internal customers.

Establish Web site development tools and feedback mechanisms that allow customers to provide input to future site design.

By: 12/31/03

Percent Complete  
100%

Status:  
The feedback forms have been created and posted. The Web team is now gathering comments. Development tools have been ordered.

Create and migrate Web site to new common look with input from external customers and focus groups.

By: 6/30/05

Percent Complete

0%

Status:

The Web team is gathering input from customers and waiting for guidance on new state portal look, feel and structure.

Integrate agency site development with statewide Web initiatives.

Ongoing

Percent Complete

50%

Status:

The agency is working with state Webmasters and Access Indiana to better integrate and ensure compliance with 508 standards.

Create an on-line publication catalog/archive that will enable external and internal customers' access to all agency publications.

By: 6/30/05

Percent Complete

65%

Status:

The database system has been created and testing is underway. The Web side interface should be complete by July 2004. The project is now in the Access Indiana work queue.

## 2.11. Office of Planning and Assessment

The IDEM Office of Planning and Assessment directs IDEM's planning and assessment activities to support the agency mission and agency-wide priorities. The Office directs the development of short and long-term plans for the agency and guides agency-wide priorities that require coordination amongst IDEM's media and support offices.

### Office Contact(s):

Paula Smith  
Director  
Office of Planning and Assessment  
(317) 233-1210  
e-mail: [psmith@dem.state.in.us](mailto:psmith@dem.state.in.us)

OPA coordinates and manages the agency quality system (as described in the agency's Quality Management Plan) and the Environmental Performance Partnership Agreement (EnPPA). The OPA also coordinates with state agencies and the U.S. Environmental Protection Agency on environmental strategies and planning.

### 2.11.1. Agency Priorities

#### 2.11.1.1.

#### Building a Better IDEM – Centralized Web Development

Lead Office: MACS/OMBA-BSD

Office of Planning and Assessment will designate staff to act as "Content Managers" to represent the office. The content manager will be responsible for ensuring that materials posted to the Web from Office of Planning and Assessment are appropriate and current, and will assist staff within the office in posting new content. The content manager will also assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to MACS.

Share information on office publications for use in the on-line publication catalog/archive.

#### 2.11.1.2.

#### Building a Better IDEM – Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD / OPA

Provide brief incoming introductory data stewardship training for new staff entering into positions where data entry is required. Office Data Contact (ODC) to actively participate in data management team meetings and activities regarding the agency's data integration effort. Office Data Contact (ODC) to actively participate in Data Management Team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. Office Data Contacts will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance.

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

Ongoing activity. Data Management Team meetings continue with all office involvement. Sharing of information and teamwork has proved very valuable. We are currently working on updating some policies.

**2.11.1.3.****Building a Better IDEM – Establish Facility Registry System (I-FRS)**

Lead Office: OPA/OMBA-BSD

OPA will:

- Provide business process management and project oversight.
- Develop standard operating procedures and agency policy dictating Data Steward standards.
- Train all existing data steward staff in the use of the developed SOPs and agency policies associated with the Indiana Facility Registry System.
- Continue to apply for Readiness Grant Funding from the National Environmental Information Exchange Network (NEIEN).

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

Conducted I-FRS Data Steward Training for 30 staff from OWQ and OLQ. OAQ and other support offices are being scheduled.

Provided I-FRS business process management and project oversight to successfully implement the Indiana facility Registry System as the Agency's central facility system.

Prepared progress and funding activities on quarterly reports to EPA and IDEM accounting tasks, deliverables, timeframe, staff, contractors, and milestones.

Distributed facility data standards for naming conventions, and required data elements for I-FRS. Coordinated and trained staff to establish Agency-wide Data Stewardship Network.

Set up procedures to provide support for resolution of facility data standards, and track the progress. Facilitate the resolution of issues of concerns about facility identification and linkages that arise between and/or across programs.

Set-up and maintain I-FRS registered users. Maintain user IDs and passwords, and change the access levels of other users to the Indiana Facility Registry System (I-FRS). Prepare status reports on users for QA/QC.

**2.11.1.4.****Building a Better IDEM – Address Quality Issues – Quality Management Plan**

Lead Office: OPA

EPA Role: EPA Region 5 will provide the IDEM QA Manager with relevant information about quality related issues; act as coordinator and conduit for Region 5 State Science Council research and educational activities; and provide guidance on implementing peer review policies and procedures.

\* EPA Region 5 will provide guidance on the use of quality assurance tools and procedures required to evaluate the effectiveness of IDEM's Quality system, as well as having a role in actually monitoring and assessing IDEM's Quality System and Quality Management Plan.

Continue implementation of management and technical quality assurance and quality control policies and procedures throughout the agency as described by the agency Quality Management Plan (QMP).

Ongoing through 6/30/05

Percent Complete  
50%

Status:

Implementation of management and technical quality assurance and quality control policies and procedures is ongoing. Participate in State Science Tribal Network conference calls and coordinated an EPA STAR Seminar.

Quality Assurance (QA) assessment of IDEM's Quality System and Quality Management Plan to include expansion of IDEM QA Team and hold at least quarterly meetings; develop implementation and assessment phase policies and procedures for ensuring consistency of quality assurance practices throughout the agency; perform annual QMP and Quality System review and report to IDEM management and EPA Region 5; and develop a plan and timeline for performing other technical and management assessment processes throughout IDEM program offices.

Ongoing though 6/30/05

Percent Complete  
50%

Status:

A QMP team meeting was held on June 8<sup>th</sup> to discuss management systems review (MSR) scheduled for August 16-19, 2004. Have worked with EPA and program staff to schedule MSR interviews. Have received many program office QMP revisions, and some lists of standard operating procedures, but have not evaluated all revisions for an EPA and IDEM management report. Anticipate completion prior to August MSR. Meeting to discuss development of implementation and assessment policies and procedures will also be in the near future.

Manage quality-related documents, to include the tracking of Quality Assurance Project Plans (QAPPs), in the agency QAPP tracking database; the listing of Standard or Current Operating Procedures (SOPs/COPs), as well as the listing of the myriad of other technical, guidance and non-rule policy documents used within the agency; and identify any 'new' quality-related documents, grants, contracts, and programs that must be referenced in the agency QMP.

By: 6/30/05

Percent Complete  
50%

Status:

The IDEM QA Team has been working to review and revise all quality-related documents for inclusion in the next approved draft of IDEM's Quality Management Plan, to include lists of standard or current operating procedures. Some new program grants have also been identified for inclusion in the QMP--OPPTA CLEAN Community Challenges and the BEACH Act.

Communicate quality-related information by participating in monthly or bimonthly meetings with Region 5 State Science Council. Per our commitment in the QMP, participate in the IDEM 'peer review' panel that will be assembled to develop agency-wide policies and procedures to review and approve study plans and reports for major special studies and other technical documents for

publication and distribution. An agency-wide peer review policy and implementation timeline will also be developed.

Ongoing though 6/30/05

Percent Complete  
50%

Status:  
OPA has participated in the monthly Region 5 State/Tribal Science Network (STSN -- was previously called the science council) conference calls as well as disseminated information received from the regional coordinator. No development of the peer review panel this quarter, but anticipate some activity following the August Management Systems Review.

#### **2.11.1.5. Building a Better IDEM - Develop IDEM Strategic Plan**

Lead  
Office:  
OPA

Develop/refine a new strategic plan for IDEM to guide future agency initiatives.

##### **1) Internal document**

6/30/04

Percent Complete  
25%

Status:  
Memo is ready to send to IDEM stakeholders requesting comments on IDEM's current strategic plan. Working on potential edits, changes and revamp for the next strategic plan.

##### **2) External draft**

12/31/04

Percent Complete  
0%

Status:  
Dependant on internal document being ready.

##### **3) Final Draft**

6/30/05

Percent Complete  
0%

Status:  
Will be ready when above tasks are completed.

#### **2.11.1.6. Coalition Building - Reducing Environmental Asthma Triggers**

Lead Office:  
OPA/OAQ

EPA Role: Grant funding. Advisor to the Environmental Quality Workgroup.

**Work with Indiana Joint Asthma Coalition (InJAC) to reduce asthma effects on children**  
Lead: Paula Smith, Tami Johnson and Cheri Storms (OPA)



IDEM will work with its co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees. IDEM will:

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems.

#### Research

By: 10/31/03

Percent Complete

100%

Status:

Initial surveillance report was made to InJAC on March 11, 2004. TRI and air data were included.

#### Development

By: 2/29/04

Percent Complete

85%

Status:

OPA staff continue to work with Indiana State Department of Health (ISDH) staff on leading the Indiana Joint Asthma Commission (InJAC) as well as two subcommittees - Environment and Children and Youth. The overall InJAC plan will be developed on time, with the help of ISDH and several contractors. The Environmental and Children and Youth Group have both finalized their respective goals and objectives and strategies, definitions and rationale background information. The contractor will edit the state plan, which is due September 2004.

Work with the Environmental Quality committee to access information and evaluate the environment in Indiana, using available information, to develop recommendations to identify known and potential indoor/outdoor environmental triggers for asthma, and to identify strategies and develop tools for organizations to reduce exposures to asthma triggers.

By: 6/30/05

Percent Complete

65%

**Status:**

The Environmental Quality committee has drafted a number of issue briefs, which will support their recommendations. The Environmental Quality Committee has also developed a "triggers" table, which will reference triggers listed in the Committee's final recommendations, and will also support the web-based tool. The table needs to go out for comment one more time. IDEM staff drafted a web-based tool, and received approval from both the Environmental Quality and Children and Youth committees to move forward. IDEM has a contractor (through the Indiana Environmental Health Association) that is assisting in the development of its web-based tool and related triggers. The IDEM design team is in the process of designing the Astherville and graphics that will be included in the tool. The content of information has been developed for the school, childcare, parents, housing (homeowners, rental, and tenants), medical providers and outdoor settings. After the design team has developed a full set, it will go out for comment to Environmental Quality group and other members of InJAC.

The Environmental Quality Committee has met with the four sub-committees to discuss how to work together, avoid duplication of efforts, etc.

Establish a comprehensive plan to reduce the burden of asthma in four sets of age groups of children: reduce encumbrance of asthma for children; and develop a comprehensive asthma surveillance system for each of the four age groups.

By: 6/30/05

Percent Complete  
85%

**Status:**

The Children and Youth INJAC Workgroup meet monthly. The group is working to develop its goals, objectives and strategies for the State Asthma Plan. The Children and Youth Group has finalized goals and objectives and strategies, definitions and rationale for the GOS. The group has also prioritized the objectives and strategies. The contractors will be editing for the Sept 2004 deadline. Then, the plan will go to commissioners of IDEM/ISDH for their comments.

Develop educational material regarding environmental triggers of asthma and distribute to childcare facilities and other interested parties. (Indiana Recycling Initiative (SIRI), Northern Indiana Recycling Initiatives (NIRI), Association of Indiana's Solid Waste Management Districts (AISWMD), Indiana Association of Cities and Towns (IACT))

Lead: Pat Daniel (OPA)

By: 6/30/05

Percent Complete  
50%

**Status:**

IDEM has received EPA funding and hired a contractor from the Environmental Health Association. IDEM staff and contractor have been working on the content of the tool by setting up focus groups. To date, the school, childcare, medical, housing and parent focus groups have met. The outdoor environment focus group needs to meet. The content of the information is completed in draft form. But, will need to go out for comment to the Environmental Quality and other members of Indiana Joint Asthma Coalition (InJAC). The design team is working on the house and school part of the town.

**2.11.1.7.****Coalition Building –Environmental Education**

**2.11.1.8.****Build on environmental education efforts**

Lead Office: OPA

EPA Role: Funding, guidance

IDEM will continue to build on its efforts to educate citizens about environmental issues and ways to become involved in environmental protection.

The agency will accomplish this by:

Expanding IDEM's education and outreach efforts by encouraging environmental experts, including staff chemists, geologists, and other scientists to make school presentations as partners with OPA's Education Team.

By: 6/30/05

Percent Complete

50%

Status:

IDEM staff were consulted for expertise in various areas and utilized where applicable to make presentations.

Coordinating IDEM school presentation resources and materials, including Earth Week presentation kits and IDEM exploration books.

By: 6/30/05

Percent Complete

50%

Status:

New resources were added to the environmental education web site. New materials were gathered for use in various presentations.

Assisting in outreach events, such as, Earth Day Indiana, the Hoosier Association of Science Teachers (HASTI) convention, the Indiana Youth environmental Summit (IYES), the Indiana State Fair, and Indiana Recycling Coalition (IRC) education sessions.

Ongoing

Percent Complete

50%

Status:

Events completed include in the last quarter include: Girl Scout Troop Leader training workshop, Martin Luther King Jr. Service Day, 3 school visits, Indianapolis Association for the Education of Young Children Conference Teacher Workshop, Hoosier Association of Science Teachers Workshop, America Recycles Day Business Workshop, and the Statewide Association for the Education of Young Children Conference Teacher Workshop.

Developing and distributing information regarding mercury, asthma, and child care facility programs to children, parents, and educators.

Ongoing

Percent Complete  
50%

Status:  
These materials continue to be distributed at the respective events mentioned above.

Distributing home self-assessment booklet and IDEM supplement for potentially harmful items found in the home to citizens and schools.

By: 6/30/05

Percent Complete  
50%

Status:  
New hard copies have arrived for distribution.

#### **2.11.1.9.**

#### **Maintain Essential Environmental Services – Agency-Wide Permit Team**

Lead: Deputy Commissioner / OPA

Ongoing through 6/30/05

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

#### **2.11.1.10.**

#### **Maintain Essential Environmental Services – Agency-Wide Permit Team**

Lead: Deputy Commissioner / OPA

Ongoing through 6/30/05

Enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Establish IDEM Permit Team, consisting of key permit managers and support managers to steer process, administrative and program improvements and efficiencies.

By: 10/1/03 - Establish Team

Percent Complete  
50%

Status:  
Group has been assembled and monthly meetings are held. Workplan developed in the form of a continuously updated topical listing.

12/1/03 - Establish Team Workplan 1/20/04 -  
Implement Workplan

Percent Complete  
5%

Status:  
Beginning to draft workplan.

**2.11.1.11.  
Maintain Essential Environmental Services - Internet public notice  
standardization**

Lead Office: OPA

Work with the program areas to improve and standardize methods of posting permitting decisions for public notice on the Internet.

Ongoing through 6/30/05

Percent Complete  
5%

Status:  
This topic is being addressed by MACS and the Permit Team. MACS will be assembling a workgroup to evaluate.

Assemble a workgroup to evaluate, improve, and standardize the way public notice information for permits is posted to the Web.

By: 4/30/04

Percent Complete  
0%

Status:  
Not started. MACS will be assembling workgroup.

Investigate possibility of establishing a centralized/cross-program public notice website for the agency. Evaluate options and compile recommendations for next steps.

By: 9/30/04

Percent Complete  
0%

Status:  
Not started

Coordinate and implement plans devised by the workgroup.

By: July 31, 2005 (Dependent upon  
decisions made by the workgroup)

Percent Complete  
0%

Status:  
Not started

Develop standard operating procedures (SOPs) for standardized processes developed and train affected employees and document training with HR and respective program office employee files.

By: 7/31/05 (Dependent upon decisions  
made by the workgroup)

Percent Complete  
0%  
Status:  
Not started

**2.11.1.12.****Maintain Essential Environmental Services – Compliance / Enforcement Team**

Lead: OE

Routinely participate in CE Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

Ongoing through 6/30/05

Percent Complete  
50%  
Status:  
OPA Staff co-lead this group.

**2.11.1.13.****Reducing Key Environmental Threats –Risk Advisory Committee**

Lead Office: OPA

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Due Date / Through: 6/30/05

Percent Complete  
0%  
Status:  
Due to staffing issues, this group has not been able to move forward. New staff person was hired and we hope to move this forward within the next quarter.

Lead by OPA, IDEM program offices, OAQ, OLQ, OWQ and OPPTA, will work to:

Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list

By: 12/30/03

Percent Complete  
0%  
Status:  
See above.

Develop a process to make better risk-based decisions and allocation of resources

By: 6/30/04

Percent Complete  
0%  
Status:  
See above.

Assist other IDEM offices in addressing their priority contaminants

By: 6/30/05

Percent Complete  
0%  
Status:  
See above.

Participate in agency-wide meetings

Through 6/30/05

Percent Complete  
0%  
Status:  
See above.

#### **2.11.1.14. Reducing Key Environmental Threats – Environmental Risks – Address Mercury Issues**

Lead Office:  
OPA/OAQ

IDEM has assembled a mercury workgroup to address mercury concerns.

Mercury is a priority chemical based on concern over human exposure, available data, multi-media issues and a focus to reduce the release of mercury into the environment - especially where kids are present.

As an agency, IDEM will focus on:

Implementing recommendations for next steps to reduce mercury emissions.

Through: 6/30/05

Percent Complete  
60%  
Status:  
Workgroup members have been working to identify and quantify emission sources into an inventory. The United States Geological Survey (USGS) is using this preliminary information and relating it to its findings regarding atmospheric deposition of mercury. In turn, OAQ is using this information as it works to address electric utilities in Indiana. Key workgroup members are also involved in meetings with USGS regarding continuation of the air deposition monitoring agreement.

Developing overall multi-media mercury reduction plan, identifying the various mercury "loads".

Through: 6/30/05

Percent Complete  
35%

**Status:**

With the preliminary inventory emissions, we are in a position to identify the sources that are contributing the greatest "loads" and provide that information to the relevant program areas within IDEM.

Continuing implementation of the mercury deposition monitoring project and analysis of data in coordination with United States Geological Survey and issue final report.

Through: 6/30/05

**Percent Complete**

75%

**Status:**

Monitoring is ongoing for both wet and dry deposition of mercury and trace metals. Data analysis continues for mercury events that are considered large when compared to other sites and seasons in the database. We are in the process of discussing future activities related to ongoing monitoring.

### 2.11.1.15. Mercury Inventory and Data Analysis

Gather and analyze mercury data to provide key information to guide IDEM's mercury water quality planning efforts, a part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, and fish tissue sampling data.

Chart USGS data and Cross reference USGS data with IDEM data.

By: 9/30/04

**Percent Complete**

20%

**Status:**

Tables with Mercury emissions (estimates/reported emissions) have been developed by OAQ for the years 1996, 1997, 1999, 2000, and 2001. The data beginning with 1999, and afterward, is the most reliable. It has been decided there are a few errors in the 2000 data that will be fixed, and then the "by county", and "by source" mercury emissions data will be resorted, and forwarded to USGS for possible correlation with their deposition data.

List Mercury (Mercury) reduction actions/projects IDEM has already taken.

By: 10/31/03

**Percent Complete**

65%

**Status:**

An earlier, 2000, document has been revised, and now is being reviewed by other IDEM staff working on Mercury projects, who will make additional corrections to the list of actions taken.

Get latest (2000) rapids (EPA) data and analyze it to compare with 1997 and 1999 rapids data (this data is released biennially).

By: 10/31/03



Percent Complete  
50%

Status:

We now have data for both 2000 and 2001 to go with the earlier 1996 and 1997 data. 2002 data will be available later this year. The 2000 data requires some correction. Once the 2000 data is available, the tables comparing 1997, 1999, 2000, and 2001 will be resorted in rank order.

Assess impact of more stringent federal rules on medical waste incinerators.

By: 12/31/03

Percent Complete  
40%

Status:

The more stringent federal rules on medical waste incinerators has lead to all but 7 such sources in Indiana shutting down. The data gathered before 1999 is both the most plentiful and least accurate. This project will be finalized before the next update.

Gather available data on reported Mercury discharges from Indiana publicly owned treatment works (POTWs).

By: 6/30/05

Percent Complete  
0%

Status:

Project not yet begun because of the lack of available and reliable discharge data from the POTWs.

In conjunction with the wastewater triennial review, determine, as fully as possible, the various sources of Mercury in the influent of POTWs.

By: 12/31/04

Percent Complete  
45%

Status:

OPA is participating in OPPTA's workgroup on this topic. We continue to help identify the various sources.

#### 2.11.1.16. Mercury Exposure and Education

Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
IDEM continues to participate on National groups and helps lead the ECOS Quicksilver groups.

#### 2.11.1.17. Mercury Thermostat Reduction & Recycling Program

Continue to promote and manage the thermostat program and attend HVAC-R (heating, ventilation, air conditioning and refrigeration) association meetings.

Through: 6/30/05

Percent Complete  
50%

Status:  
OPA submitted an article for the Air Conditioning Contractors Association (ACCA) newsletter. ACCA has recently expanded to a state-wide organization, and has a potential to reach suppliers and contractors throughout the state.  
  
OPA is working with the Product Stewardship Institute (PSI) to work with a variety of partners to gather information regarding improving the recycling rate of mercury thermostats.

OPA staff also met with staff from the Office of Air Quality (OAQ) regarding an outreach program to demolition contractors that would encourage them to recycle mercury-containing items prior to demolishing buildings. OPA is in the process of revising its pledge forms and customer brochures, and OAQ will distribute the material, as needed.

Conduct annual outreach to the thermostat program participants to ensure they are properly serviced by the Thermostat Recycling Corporation and that they have an adequate supply of IDEM promotional materials.

By: 6/30/04 and 6/30/05

Percent Complete  
20%

Status:  
Draft letter is in progress. Web site has been updated. Updated brochures are in process.

#### 2.11.1.18. Dental Mercury Program

Work with the Indiana Dental Association, the Indiana State Department of Health, and other interested parties to develop an environmental pledge program for Indiana dentists. In addition to mercury, the pledge will address lead and silver.

By: 6/30/04

Percent Complete  
0%

Status:  
The scope of this project has changed, as IDEM has decided to move forward with a proposed variance that would be available for the various POTWs to adopt, if interested. OPPTA received a grant, and is working on this effort.

Working with the Indiana Dental Association, and the Indiana State Department of Health, conduct outreach to Indiana Dentists to encourage them to participate in the pledge program.

By: 10/31/04

Percent Complete

0%

Status:

See above.

Upon request, assist Indiana dentists by providing information and assistance as they work to join the pledge program. This may include site visits, providing information, and/or developing guidance documents.

Through: 6/30/05

Percent Complete

0%

Status:

See above.

Work with the Indiana Solid Waste Management Districts (SWMDs) to coordinate the proper management of dental waste. Assist participating dentists with finding proper vendors for their waste.

Through: 6/30/05

Percent Complete

70%

Status:

Working with OPPTA staff to determine which Solid Waste Management Districts (SWMDs) will accept dental waste. Revised and expanded the list of dental recyclers, which has been submitted to MACS for posting to IDEM's website.

#### **2.11.1.19. Mercury Deposition Monitoring**

Continue and complete implementation of mercury deposition monitoring project; complete analysis of data in coordination with United States Geological Survey, issue final report.

Through: 6/30/05

Percent Complete

80%

Status:

The project is underway and runs through Sept. 2004, at which time the data will be finalized and the report drafted.

#### **2.11.1.20. Mercury Switch Removal**

Develop and implement a program to provide outreach to asbestos renovation/demolition contractors to remove mercury switches prior to renovation or demolition of buildings.

By: 6/30/04

## Percent Complete

Development of informational materials 100% Complete; implementation is on-going.

## Status:

OAQ continues to work with these contractors. Fact Sheet for asbestos renovation/demolition contractors developed and being posted on website. Fact Sheet and Mercury Awareness Program pamphlet identifying mercury containing items to be given out by field inspectors during on-site inspections. Will consider other outreach strategies such as holding a public meeting for asbestos renovation/demolition contractors to educate them on mercury switch removal. Indianapolis OES added a similar provision in their contract with IDEM to provide outreach to asbestos renovation/demolition contractors.

**2.11.1.21. Mercury & Schools**

Lead the school mercury reduction and recycling pledge program. Conduct outreach campaign and offer assistance to schools, SWMDs, and the City of Indianapolis where needed.

Through: 6/30/05

## Percent Complete

50%

## Status:

405 Indiana schools now participate in the pledge program having inventoried their buildings for mercury and mercury-containing items, taken all items for proper recycling to their local solid waste management district, and signed the pledge to phase out the purchase of such items.

**2.11.1.22. Reducing Key Environmental Threats – Environmental Risks - Enviro-School Program**

Lead Office: OPA

EPA Role: Provide funding and guidance.

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

Due Date / Through: 6/30/05

## Percent Complete

45%

## Status:

The selected contractor, Environmental Management Institute (EMI), will act as project manager. IDEM staff has met with the contractor to provide background information to move the project further. Contract documents are in the signatory process and the next meeting has been tentatively scheduled for the end of August.

**2.11.1.23. Reducing Key Environmental Threats – Environmental Risks – Address Potential Environmental and Health Threats in Homes and Communities**

Lead Office: OPA

Expand the Children's Health Program:

Partner with the Indiana State Department of Health and Indiana Family Social Services Administration to expand the Children's Health Program on areas such as asthma triggers, integrated pest management practices, lead prevention to include sensitive populations located in long-term care facilities, hospitals and rehabilitation centers.

By: 12/1/04

Percent Complete  
0%

Status:

At this point, IDEM does not have the staff to take on long-term care facilities. Due to staff shortage issues and funding issues, IDEM will need to discuss internally if this project is possible.

#### **2.11.1.24. Reducing Key Environmental Threats – Environmental Risks – Integrated Pest Management (IPM)**

Lead Office: OPA

Work with schools and child care facilities and the Indiana Family and Social Services Administration to implement the IPM model that was developed from the pilot project.

Ongoing through 6/30/04

Percent Complete  
100%

Status:

IDEM has partnered with Purdue University to implement the pilot project and pesticide policy developed for childcare facilities. The brochure has been completed and will be promoted with the Children's Environmental Health Program.

#### **Integrated Pest Management (IPM) curriculum**

Publish IPM curriculum

Conduct outreach to childcare facilities and schools

By: 6/30/05

Percent Complete  
10%

Status:

The curricula has been developed, but due to staffing issues, we are waiting to make it in a presentable format and make it available for the Web-site.

#### **2.11.1.25. Reducing Key Environmental Threats – Environmental Risks – Reduce Diesel Emissions**

Lead Office:  
OAQ/OPA

Enhance diesel emissions reduction efforts by working to develop and implement projects to reduce emissions from diesel sources, including school bus anti-idling pilots, school bus and/or municipal fleet retrofit projects, truck stop electrification project and development of web-based diesel emissions resource center.

- Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

Percent Complete  
100%

## Status:

On April 23 STAI with IDEM support voted to approve an Idling resolution to limit idling in up to 95% of the school systems in Indiana. Staff continue to work to encourage entities to opt-in to the idling policy adopted by the STAI.

- Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

Percent Complete  
85%

## Status:

IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, to \$250,000, which will enable 100% of the Evansville school fleet to be retrofitted. Staff continue to work in cooperation with the Northwest Diesel Workgroup.

- Develop and distribute marketing materials for this volunteer program.

By: 6/30/05

Percent Complete  
50%

## Status:

Anti-idling literature and a sticker or magnet for use in school buses is currently being developed. Anti-idling signs are being designed and the web-based diesel resource center is under construction.

- Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

Percent Complete  
0%

## Status:

No activity this quarter.

**2.11.2. Office Priorities****2.11.2.1.**

PPG (Y/N): N

### **Address Potential Environmental and Health Threats in Homes and Communities**

#### Expand the Children's Health Program:

Partner with the Indiana State Department of Health and Indiana Family Social Services Administration to expand the Children's Health Program on areas such as asthma triggers, integrated pest management practices, lead prevention to include sensitive populations located in long-term care facilities, hospitals and rehabilitation centers.

By: 12/1/04

Percent Complete

0%

Status:

Due to staff shortages and funding issues, IDEM will need to discuss internally if this project is possible.

#### **2.11.2.2. Integrated Pest Management (IPM)**

PPG (Y/N): N

Work with schools and child care facilities and the Indiana Family and Social Services Administration to implement the IPM model that was developed from the pilot project.

Ongoing through 6/30/04

Percent Complete

100%

Status:

DEM has partnered with Purdue University to implement the pilot project and pesticide policy developed for childcare facilities. The brochure has been developed and will be promoted through IDEM Children Environmental Health Program.

#### **2.11.2.3. IPM curriculum**

PPG (Y/N): N

Cross-Office? (Y/N): N

Publish IPM curriculum. Conduct outreach to childcare facilities and schools.

By: 6/30/05

Percent Complete

30%

Status:

The curricula has been developed and reviewed. Will be giving it to MACS to make it available for the Web site.

#### **2.11.2.4. Asthma [and Indiana Joint Coalition for Asthma (InJAC)]**

PPG (Y/N): Y

Cross-Office? (Y/N): N

EPA Role: Grant funding. Advisory role for the Environmental Quality Workgroup.

Work with co-leads, as well as local health department, the medical community, and various health and environmental organizations to reduce environmental triggers of asthma. InJAC, established by IDEM and Indiana State Department of Health (ISDH), consists of five subcommittees.

Work with the Data Collection & Surveillance committee research asthma data findings to prepare an initial asthma surveillance report and develop recommendations for asthma surveillance reporting systems

**Research by 10/31/03 (OAQ)**

Percent Complete  
85%

**Status:**

Initial surveillance report went out for comments from the InJAC members. Final version should be completed by the State plan in September 2004.

**Development by 2/29/04 (OPA)**

Percent Complete  
85%

**Status:**

OPA staff continue to work with ISDH staff on leading the Indiana Joint Asthma Commission (InJAC) as well as two subcommittees - Environment and Children and Youth. The overall InJAC plan will be developed on time, with the help of ISDH and several contractors. The Environmental and Children and Youth Group have both finalized their respective goals, strategies and objectives. The GOS from both groups have been the rationale completed and they have been prioritized.

Work with the Environmental Quality committee to access information and evaluate the environment in Indiana, using available information, to develop recommendations to identify known and potential indoor/outdoor environmental triggers for asthma, and to identify strategies and develop tools for organizations to reduce exposures to asthma triggers

**By: 6/30/05**

Percent Complete  
85%

**Status:**

The Environmental Quality committee has drafted a number of issue briefs, which will support their recommendations. The Environmental Quality Committee developed a triggers table, which will reference triggers listed in the Committee's final recommendations, and will also support the web-based tool. IDEM staff drafted a web-based tool, and received approval from both the Environmental Quality and Children and Youth committees to move forward. IDEM has a contractor (through the Indiana Environmental Health Association) that is assisting in the development of its web-based tool and related triggers. The contractor and OPA staff have drafted all the content information for the tool in the target settings for schools, childcare, outdoor, housing, medical and parents. The draft just needs to be presented to the Environmental Quality Workgroup and other InJAC members. The IDEM design team is designing the target settings for the school, home, medical, childcare, parent and outdoor settings.

The Environmental Quality Committee has met with the other 4 sub-committees to discuss how to work together, avoid duplication of efforts, etc.

Establish a comprehensive plan to reduce the burden of asthma in four sets of age groups of children: reduce encumbrance of asthma for children; and develop a comprehensive asthma surveillance system for each of the four age groups.

**By: 6/30/05**

Percent Complete  
85%



## Status:

The Children and Youth InJAC Workgroup meet monthly. The group has developed its Goals, Objectives and Strategies for the State Asthma Plan. The group has also completed the definitions rationale for the goals, objectives and strategies and prioritization of these GOS. The contractors will edit the state plan, which is due September 2004.

Develop educational material regarding environmental triggers of asthma and distribute to childcare facilities and other interested parties.

By: 6/30/05

Percent Complete  
50%

## Status:

IDEM has received EPA funding and hired a contractor from the Environmental Health Association. IDEM staff and contractor have been working on the content of the tool by setting up focus groups. To date, the school, childcare, medical, parents and housing focus groups have met. The material content is completed for these settings. The Environmental Quality and other members of InJAC will need to comment. The IDEM design team will be designing the target settings with the content material tagged to each picture. The Design Team has started to work on the school and home settings.

#### 2.11.2.5. Clean Sweeps

PPG (Y/N): Y

EPA Role: Grant funding.

Conduct a third round of laboratory chemical clean-outs ("Clean Sweeps") at selected schools across Indiana. Thirty (30) of the 400+ schools participating in the Mercury Recycling Pledge Program will be selected to have the "Clean Sweep" services provided at no cost to the school. All schools participating in the pledge program will be encouraged to apply for these services.

1) Finalize scope of work and submit Request for Information to potential contractors.

By: 1/1/04

Percent Complete  
0%

## Status:

Currently trying to address timing issues on completing the project by the due date.

2) Select schools and ask for a commitment letter.

By: 5/31/04

Percent Complete  
0%

## Status:

See above.

4) Select contractor to remove unused and expired chemicals and properly dispose of them.

By: 5/31/04

Percent Complete  
0%

Status:  
See above.

5) Organize and coordinate schedule with contractor and respective schools.

By: 5/31/04

Percent Complete  
0%

Status:  
See above.

5) Conduct Clean Sweeps.

From: 6/1/04 – 8/31/04

Percent Complete  
0%

Status:  
See above.

6) Prepare and submit final report to EPA, which will include a break down of the types of chemicals removed including specific EPA waste minimization priority chemicals.

By: 10/31/04

Percent Complete  
0%

Status:  
Currently addressing timing issues.

#### **2.11.2.6. Diesel Emissions Reduction**

PPG (Y/N): N

Work to create a statewide volunteer "No idle at schools" policy for school buses.

By: 6/30/04

Percent Complete  
100%

Status:  
On April 23 STAI with IDEM support voted to approve an Idling resolution to limit idling in up to 95% of the school systems in Indiana. Staff continue to work to encourage entities to opt-in to the idling policy adopted by the STAI.

Form a partnership to initiate this program in Northwest and Southwest Indiana schools, and, ultimately, statewide.

By: 6/30/04

Percent Complete  
85%

## Status:

IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, to \$250,000, which will enable 100% of the Evansville school fleet to be retrofitted. Staff continue to work in cooperation with the Northwest Diesel Workgroup.

Develop and distribute marketing materials for this volunteer program.

By: 6/30/05

## Percent Complete

50%

## Status:

Anti-Idling literature and a sticker or magnet for use in school buses is currently being developed. Anti-idling signs are being designed and the web-based diesel resource center is under construction.

Work with the Office of Air Quality to investigate, and, as funding is available, implement school or municipal fleet retrofit projects.

By: 6/30/05

## Percent Complete

70%

## Status:

Once State QPA is in place we are ready to move forward on several projects. IDEM received a grant under the Clean School Bus USA grant program on July 1, 2004, for \$250,000 to be used on Evansville and Indianapolis school buses. A new grant was filed on July 2, 2004, for the voluntary retrofit program.

Develop and market resource packet for schools and municipalities on options and grant opportunities for retrofits, cleaner or alternative fuels, and other measures to reduce diesel emissions.

By: 6/30/05

## Percent Complete

0%

## Status:

No activity this quarter.

### 2.11.2.7. Tools for Schools

PPG (Y/N): N

Cross-Office? (Y/N): N

Continue to partner with the U.S. Environmental Protection Agency to market asthma education and actively promote the Tools for Schools curriculum in schools / school districts.

Ongoing through 6/30/05

## Percent Complete

100%

## Status:

The grant expires September 30, 2004. The final report will be sent to EPA.

### 2.11.2.8.

PPG (Y/N): N

**Indoor Air Quality Curriculum****Cross-Office? (Y/N): N**

EPA Role: EPA produces the Tools for Schools kit, which promotes indoor air quality. This curriculum's approach will be similar to Tools for Schools - but will be Indiana-specific and will focus on teachers. EPA will be reviewing the curriculum.

Print Indiana's Indoor Air Quality curriculum materials and place them on IDEM's website.

By: 6/30/04

Percent Complete  
25%

Status:  
Due to staff issues, the first draft has been created, but must be revised and approved before placing it on IDEM's Web site.

The Environmental Education Team will conduct outreach to schools to promote and implement Indiana's Indoor Air Quality curriculum.

By: 6/30/05

Percent Complete  
0%

Status:  
Waiting on completed program.

**2.11.2.9.  
Lead****PPG (Y/N): N****Cross-Office? (Y/N): N**

EPA Role: Grant funding. Provide oversight of grant to Office of Air Quality.

**Mini grants:**

Award and manage 10 mini grants to local health departments and Community Action Agencies to address compliance assistance for Indiana lead contractors, lead licensed personnel and individuals/organizations.

By: 9/30/03

Percent Complete  
100%

Status:  
Report mailed to EPA in December. New mini-grants were also offered.

**2.11.2.10.  
Enviro-School Program****PPG (Y/N): N****Cross-Office? (Y/N): N**

EPA Role: Partner in project.

**Enviro-School Program:**

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

By: 6/30/05

Percent Complete  
35%

**Status:**

The selected contractor, Environmental Management Institute (EMI), will act as project manager. IDEM staff has met with the contractor to provide background information to move the project further. Contract documents are in the signatory process and the next meeting has been tentatively scheduled for the end of August.

**2.11.2.11.  
Risk Advisory Committee**

PPG (Y/N): N

Cross-Office? (Y/N): N

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Ongoing through 6/30/05

Percent Complete  
0%

**Status:**

Due to staffing issues, this group has not been able to move forward. New staff person was hired and this group will meet within the next quarter.

Lead by OPA, IDEM program offices, OAQ, OLQ, OWQ and OPPTA, will work to:

- 1) Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list.

By: 12/31/03

Percent Complete  
0%

**Status:**

See above.

- 2) Develop a process to make better risk-based decisions and allocation of resources.

By: 6/30/04

Percent Complete

0%

Status:

See above.

- 3) Assist other IDEM offices in addressing their priority contaminants.

By: 6/30/05

Percent Complete

0%

Status:

See above.

- 4) Participate in agency-wide meetings.

Ongoing through 6/30/05

Percent Complete

0%

Status:

See above.

#### 2.11.2.12.

#### Agency Central Facility Data System

PPG (Y/N): N

Cross-Office? (Y/N): Y

EPA Role: Continue to fund the National Environmental Information Exchange Network (NEIEN). Continue to provide policies, standards, procedures, and guidance for data management practices.

Working with IDEM's Office of Management and Budget Administration's (OMBA) Information Technology section, develop and implement Indiana Facility Registry System (IFRS) plan to streamline data exchange between IDEM and EPA and promote quality environmental data.

By: 7/31/05

Percent Complete

50%

Status:

Working with the contractors for I-FRS for the development of the data exchange process on the Network Node and data reconciliation process.

Successfully, implemented the Indiana's Facility Registry System (I-FRS) on November 2004.

In Jan. 2004 prepared and submitted a proposal for the Network Exchange Grant Application in the form of an Implementation Grant to integrate Indiana's Facility Registry System (I-FRS) with geospatial data.

Established Indiana's Facility Registry System (I-FRS) data standards for high quality collection of data incorporating facility data standards, naming conventions, required data elements, geographic standards, and etc. for facility names and location addresses.

Implemented a training plan for Indiana's Facility Registry System (I-FRS) Data Stewards agency-wide on the data standards and naming conventions.

**2.11.2.13.**  
**Mercury Issues**

PPG (Y/N): N

Cross-Office? (Y/N): N

Mercury is a priority chemical based on concern over human exposure, available data, multi-media issues and a focus to reduce the release of mercury into the environment, especially where kids are present.

**2.11.2.14.**  
**Mercury workgroup**

PPG (Y/N): N

Cross-Office? (Y/N): N

IDEM has assembled a mercury workgroup to address mercury concerns. Mercury is a priority chemical based on concern over human exposure, available data, multi-media issues and a focus to reduce the release of mercury into the environment - especially where kids are present.

As an agency, IDEM will focus on:

Implementing recommendations for next steps to reduce mercury emissions.

Through: 6/30/05

Percent Complete

60%

Status:

Workgroup members have been working to identify and quantify emission sources into an inventory. The United States Geological Survey (USGS) is using this preliminary information and relating it to its findings regarding atmospheric deposition of mercury. In turn, OAQ is using this information as it works to address electric utilities in Indiana.

Key workgroup members are also involved in meetings with USGS regarding continuation of the air deposition monitoring Agreement.

Developing overall multi-media mercury reduction plan, identifying the various mercury "loads".

By: 6/30/05

Percent Complete

35%

Status:

With the preliminary inventory emissions, we are in a position to identify the sources that are contributing the greatest "loads" and provide that information to the relevant program areas within IDEM.

**2.11.2.15.**  
**Mercury data management**

PPG (Y/N): N

Cross-Office? (Y/N): N

Gather and analyze mercury data to provide key information to guide IDEM's mercury water quality planning efforts, a part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, and fish tissue sampling data.

- Chart USGS data and Cross-reference USGS data with IDEM data.

By: 9/30/04

Percent Complete  
20%

## Status:

Tables with Mercury emissions (estimates/reported emissions) have been developed by OAQ for the years 1996, 1997, 1999, 2000, and 2001. The data beginning with 1999, and afterward, is the most reliable. It has been decided there are a few errors in the 2000 data that will be fixed, and then the "by county", and "by source" Mercury emissions data will be resorted, and forwarded to United States Geological Survey for possible correlation with their deposition data.

- List Mercury (Mercury) reduction actions/projects IDEM has already taken.

By: 10/31/03

Percent Complete  
65%

## Status:

An earlier, 2000, document has been revised, and now is being reviewed by other IDEM staff working on Mercury projects, who will make additional corrections to the list of actions taken.

- Get latest (2000) rapids (EPA) data and analyze it to compare with 1997 and 1999 rapids data (this data is released biennially).

By: 10/31/03

Percent Complete  
50%

## Status:

We now have data for both 2000, and 2001, to go with the earlier 1996 and 1997 data. 2002 data will be available later during 2004. The 2000 data requires some correction, then the tables comparing 1997, 1999, 2000, and 2001 will be resorted in rank order.

- Assess impact of more stringent federal rules on medical waste incinerators.

By: 12/31/03

Percent Complete  
40%

## Status:

The more stringent federal rules on medical waste incinerators has lead to all but 7 such sources in Indiana shutting down. The data gathered before 1999 is both the most plentiful and least accurate. This project will be finalized before the next update.

- Gather available data on reported Mercury discharges from Indiana publicly owned treatment works (POTWs).

By: 6/30/05

Percent Complete  
0%



Status:

Project not yet begun because of the lack of available and reliable discharge data from the Publicly Owned Treatment Works (POTWs).

- In conjunction with the wastewater triennial review, determine, as fully as possible, the various sources of Mercury in the influent of POTWs.

By: 12/31/04

Percent Complete

45%

Status:

OPA is participating in OPPTA's workgroup on this topic. OPA continues to assist by providing lists of various sources.

#### 2.11.2.16.

#### Mercury Exposure and Education

PPG (Y/N): N

Cross-Office? (Y/N): N

Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

Ongoing

Percent Complete

50%

Status:

Ongoing - continue to work with EPA and Environmental Coalition of States (ECOS) on mercury efforts and sharing of information.

Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Through: 6/30/05

Percent Complete

50%

Status:

Mercury efforts continue to include commenting on the new mercury rule.

#### 2.11.2.17.

#### Mercury & Schools

PPG (Y/N): N

Cross-Office? (Y/N): N

Lead the school mercury reduction and recycling pledge program. Conduct outreach campaign and offer assistance to schools, SWMDs, and the City of Indianapolis where needed.

Through: 6/30/05

Percent Complete

50%

Status:

405 Indiana schools now participate in the pledge program having inventoried their buildings for mercury and mercury-containing items, taken all items for proper recycling to their local solid waste management district, and signed the pledge to phase out the purchase of such items.

### 2.11.2.18. Auto Salvage

PPG (Y/N): N

Cross-Office? (Y/N): Y

EPA Role: Major funding source. Funded under OECA grant.  
Grant runs from 8/1/00 to 12/31/04.

Grant runs from Aug. 1, 2000 – September 1, 2004. Deliverables include a compliance assistance manual, compliance assistance workshops, inspections, enforcement actions and a final report.

Coordinate and help implement auto salvage agency-wide focus.

Ongoing through 8/1/04

Percent Complete  
100%

Status:  
Project implemented.

Coordinate workgroup to implement program.

Ongoing through 9/1/04

Percent Complete  
90%

Status:  
Final phase of project is underway. 15 inspections remain

Continue to serve as agency contact for auto salvage grant and turn in quarterly reports. Upon completion of the project, compile a final report.

By: 10/03, 1/04, 4/04, and 7/04 for quarterly reports. Final report by 8/04

Percent Complete  
50%

Status:  
Reports prepared on schedule.

Work with IDEM's Office of Land Quality, Office of Water Quality and Office of Enforcement, other State and Federal agencies, and auto salvage project inspectors, to coordinate inspections, oversee compliance referrals and establish remediation guidelines.

Ongoing through 9/1/04

Percent Complete  
80%

Status:  
Final phase of project is underway. 15 inspections remain

Conduct compliance assistance workshops throughout the state.

By: 7/31/03

Percent Complete  
100%Status:  
Workshops completed 7/03.

Submit Clean Water Act 104(b)(3) grant proposed for a series of three posters, key chains and magnets. Administer program if grant application is approved.

By: 3/31/03

Percent Complete  
100%Status:  
Proposal was not funded; will continue to seek funding source.

### 2.11.2.19. Planning and Assessment Activities

Cross-Office? (Y/N): N

#### 2.11.2.19.1. EnPPA

PPG (Y/N): N

EPA Role: Provide oversight and grant funding.

Cross-Office? (Y/N): Y

Finalize 2003-2005 EnPPA.

By: 7/1/03

Percent Complete  
100%Status:  
The 2003-2005 EnPPA was finalized in July, 2003 and signed November, 2003.

#### 2.11.2.19.2. Strategic Planning

PPG (Y/N): N

Cross-Office? (Y/N): Y

Develop/refine a new strategic plan for IDEM to guide future agency initiatives.

#### 1) Internal document

6/30/04

Percent Complete  
25%Status:  
Memo is complete and we are working to send it to external stakeholders requesting comments on IDEM's current strategic plan. Also working on potential edits, changes and revamp for the next strategic plan.

#### 2) External draft

12/31/04

Percent Complete  
0%Status:  
Dependant on internal document being ready.

## 3) Final Draft

6/30/05

Percent Complete  
0%Status:  
Will be ready when above tasks are completed.**2.11.2.20.  
IDEM's Quality Management Plan**

PPG (Y/N): N

Cross-Office? (Y/N): Y

To coordinate and implement management and technical quality assurance and quality control policies and procedures throughout the agency as described by the agency Quality Management Plan.

Due Date / Through: 6/30/05

Percent Complete  
50%Status:  
Ongoing, with an IDEM Quality Assurance Team meeting that took place on 6-8-04, and continued work on the annual Quality Management Plan review and revision process.**2.11.2.20.1.  
Management of IDEM's Quality-Related Documents (SOPs,  
Current Operating Procedures, QAPPs)**

PPG (Y/N): N

Cross-Office? (Y/N): N

\* Begin to track quarterly all Program/Office Quality Assurance Project Plans by implementing the recently developed QAPP tracking database.

By: 1/31/04, and then Ongoing 6/30/05

Percent Complete  
0%Status:  
Prototype testing to be targeted for next quarter's activities. Some modifications to the database were made however, and IDEM QA Manager received an XP upgrade and has access to the database now.

\* Develop and maintain an agency-wide listing of Standard/Current Operating Procedures (SOPs and/or COPs) to include the effective dates of such documents, as well as the SOP review schedule.

By: 1/31/04, and then Ongoing 6/30/05

Percent Complete  
50%

Status:  
Some Standard Operating Procedure Lists have been received, but there are still others to be submitted. Anticipate fleshing these out when the Management Systems Review is complete and work on Quality Management Plan revisions resume.

\* Assess and update the listings of program office QMP related files, which appear as addenda to the QMP and describe each program office's files and documents that are pertinent to the implementation of an agency Quality System (e.g., relevant rules, regulations, statutes and laws; technical and guidance documents; non-rule policy documents; etc.).

By: 6/30/05

Percent Complete  
50%

Status:  
Will continue as Quality Management Plan revision resumes when Management Systems Review (MSR) is completed in August. EPA did not want the revised document prior to conducting the MSR so this task was put on hold.

\* IDEM QA Manager to actively work with agency offices to identify quality assurance/quality control related documents and/or new grants, contracts or programs that must be referenced in the agency Quality Management Plan.

Ongoing to 6/30/05

Percent Complete  
50%

Status:  
Some new grants have been identified, and some Quality Assurance Project Plans have been reviewed and approved. and the entire QMP is being revised before the extended deadline of 12-31-04.

#### **2.11.2.20.2.**

#### **Quality Assurance Assessment of IDEM's Quality System and Quality Management Plan**

PPG (Y/N): N

#### **EPA Role:**

**Cross-Office? (Y/N): N**

\*EPA will provide guidance to IDEM on the use of quality assessment tools to evaluate the effectiveness of the IDEM Quality System.

\*EPA to provide guidance on the procedures used for the Region's review of their own Quality System and QMP.

\*EPA Region 5 will monitor and assess IDEM's Quality System and Quality Management Plan.

\* Expand the composition of the current IDEM QA Team to include program office managers and other QA/QC staff.

\* The IDEM Q/A Manager will also maintain contact monthly with at least one already developed team or workgroup within IDEM that concentrates on big-picture, cross-media Program Office work/issues (E.G. Compliance/Enforcement Team, Data Management Team, Public Records Managers, RCRA Advisory Group, IDEM QA Team; etc.)

Ongoing.

Percent Complete  
50%

Status:  
IDEM QA team was expanded a partial team meeting on 6-8-04, along with effort to continue review and revision of the Quality Management Team and coordination of the agency's first Management Systems Review scheduled for August 16-19, 2004.

\* Hold quality assurance meetings, at least quarterly, with the Quality Assurance Team (QA Team), program and project managers from all program offices and other quality assurance/quality control (QA/QC) staff within the program offices. The purpose of the meetings is to develop implementation and assessment phase policies and procedures for ensuring consistency of QA procedures across all IDEM program.

Through: 6/30/05

Percent Complete  
50%

Status:  
Expanded IDEM QA Team met on 6-8-04, and efforts continuing to review and revise the Quality Management Plan (QMP). Process to develop implementation and assessment policies and procedures will take place once the annual QMP review and revision is complete.

\* Once the processes and procedures for the implementation and assessment phases are developed, the IDEM QA Manager will work with all IDEM offices to ensure consistency of QA procedures across all programs.

Ongoing through 6/30/05

Percent Complete  
25%

Status:  
IDEM QA Team is working to also ensure the tools described in the QMP are consistent across program offices, and the team will gear up for implementation once the quality management plan is reviewed and revised.

\* Begin planning for assessments and/or reviews of specific office programs and projects. It will also be necessary to determine the order in which IDEM offices will be assessed/reviewed. Develop a timeline and plan for implementation.

By: 6/30/05

Percent Complete  
0%

Status:  
Not yet in time frame. Once the quality management plan is completely reviewed and revised the team will coordinate the internal review processes and develop a timeline and plan for implementation.

\*Assess the adequacy of the IDEM Quality System at least annually, including a review of the QMP, which will be revised or updated as required. Also, provide a report of the QMP review findings to IDEM Management and EPA Region 5.

By: 6/30/04 and 6/30/05

Percent Complete  
37.5%

Status:  
IDEM QA Team is working to revise quality management plan by the extended 12-31-04 deadline. A report to management and EPA is being developed.

**2.11.2.20.3.****PPG (Y/N): N*****QMP/Quality System Related Training***

EPA Role:

**Cross-Office? (Y/N): N**

\* EPA Region 5 Quality Assurance team to organize and/or provide quality assurance training opportunities to IDEM staff (in-house when possible).

\* EPA Region 5 to provide training, assistance, and guidance on the applicability of EPA Information Quality Guidelines to state environmental programs and the data/information submitted to EPA.

\* EPA to also provide environmental science-related informational opportunities to IDEM staff via the Region 5 State Science Council.

\* Training opportunities for the IDEM QA manager and other QA/QC staff will be identified and provided.

\* IDEM QA Manager will attend one training opportunity per year, if available, timely, and cost effective; and disseminate any relevant information to IDEM staff.

BY: 6/30/04 and 6/30/05

Percent Complete  
50%

Status:  
No new quality assurance training efforts have been identified.

\* Coordinate with IDEM Human Resource Training Director to introduce new staff to the IDEM Quality System culture and QMP via new employee orientation classes.

Ongoing through 6/30/05

Percent Complete  
0%

Status:  
Once the IDEM QA Team completes the annual QMP review and revision process, the IDEM QA Manager will work to development a new employee orientation class.

**2.11.2.20.4.****PPG (Y/N): N*****Communicating IDEM Quality-Related Information with EPA***

EPA Role:

**Cross-Office? (Y/N): N**

\* EPA Region 5 will provide the IDEM Quality Assurance Manager with any relevant information about quality related issues.

\* EPA Region 5 Science Council to provide information for implementing 'best science practices' and other techniques for ensuring that quality data is used for decision making.

\* EPA Region 5 Science Council to act as conduit to EPA Office

of Research and Development (ORD) for future research projects that might benefit IDEM's environmental efforts.

\* EPA Region 5 Science Council to provide guidance on peer review policy and procedures to achieve/ensure 'better science' within states, regions, and the nation.

\*Maintain contact with EPA Region 5 Quality Assurance Team at least one time per quarter and maintain consistent progress toward disseminating quality assurance related information.

Through: 6/30/05

Percent Complete  
50%

Status:  
Region 5 quality assurance core team members this quarter in an effort to coordinate the agency's management systems review.

\* IDEM QA Manager to serve as primary IDEM contact for EPA Region 5 Science Council and to coordinate the dissemination of science council information throughout the agency.

Through: 6/30/05

Percent Complete  
50%

Status:  
Have been participating in the monthly conference calls and coordinated the annual STAR seminar for IDEM employees.

\* Develop an IDEM Peer Review Panel that will be established to review and approve study plans and reports for major special studies and other technical documents for publication and distribution.

Through: 6/30/05

Percent Complete  
0%

Status:  
Not yet in time frame; the IDEM QA Team will begin to address this issue when the Quality Management Plan is revised by the extended deadline of 12-31-04.



## 2.12. Office of Pollution Prevention and Technical Assistance

It is the goal of the Office of Pollution Prevention and Technical Assistance (OPPTA) to develop and foster within the Indiana Department of Environmental Management's environmental protection efforts an emphasis on environmentally and economically sound approaches to achieve environmental results. This includes proactively providing resources for source reduction, re-use and recycling, voluntary compliance and pollution prevention. OPPTA encourages environmental results through various grant opportunities, public recognition awards such as the various "Governor's Awards for Excellence," broad-based educational programs and technical assistance.

### Office Contact:

Jim Mahern  
Assistant Commissioner  
Office of Pollution Prevention and  
Technical Assistance  
(317) 233-6658  
e-mail: [jmahern@dem.state.in.us](mailto:jmahern@dem.state.in.us)

### 2.12.1. Agency Priorities

#### 2.12.1.1.

#### Building a Better IDEM – Centralized Web Development

Lead Office: MACS/OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to MACS.

Share information on office publications for use in the on-line publication catalog/archive.

#### 2.12.1.2.

#### Building a Better IDEM – Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

The Office Data Contact (ODC) will actively participate in data management team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. ODC will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance.

Ongoing through 6/30/05

Percent Complete  
50%

**Status:**

Ongoing. The Office of Pollution Prevention and Technical Assistance (OPPTA) office data contact has been attending the data management team meetings on a monthly basis. To-date, the office data contact has presented to Data Management Team (DMT) and obtained approval for: Compliance and Technical Assistance Program (CTAP) Maintenance, Toxic Release Inventory (TRI) Paradox Conversion, and the Agency Locator List. The OPPTA office data contact has been designated as the contact for managing OPPTA software. During the year, he has been archiving many of OPPTA's old electronic files and has begun switching the OPPTA Recycling database from Paradox to Access. He was the OPPTA Windows XP External tester and assisted staff in preparing for switch to Windows XP in spring 2004. He assisted the DMT with finalizing the data management guide.

**2.12.1.3.****Building a Better IDEM – Address Quality Issues – Quality Management Plan**

Lead Office: OPA

Actively participate in the Region 5 State Science Council efforts as well as the IDEM 'peer review' panel development and implementation processes.

Ongoing through 6/30/05

Percent Complete  
50%

Status:  
Ongoing.

**2.12.1.4.****Coalition Building – Build on Environmental Education Efforts**

Lead Office: OPA

EPA Role: Funding, guidance

**Recycling education:** Continue educating students, teachers, consumers, public officials and businesses about the benefits of recycling and related source reduction activities through presentations, publications, guidance documents and technical assistance programs.

Ongoing

Percent Complete  
50%.

Status:  
Participating in conferences, public meeting, summer camps, Solid Waste Management Districts activities, board meetings and general grant activities sharing information on the benefits of recycling and source reduction activities. Presented education presentations to schools and participated in festivals throughout Indiana as a part of the Indiana Department of Environmental Management's Earth Day celebrations. Developed and revised a "Reduce Unwanted Mail" Web page and brochure with the assistance of our media group.

**Illegal burning:** Conducting an illegal burning workshop for public officials in partnership with groups like Southern Indiana Recycling Initiative (SIRI), Northern Indiana Recycling Initiatives (NIRI), Association of Indiana's Solid Waste Management Districts (AISWMD), Indiana Association of Cities and Towns (IACT), to

By: 6/30/05

Percent Complete  
50%.

Status:

Ongoing. Don't Burn – Recycle! Regional grant participants kicked off the public outreach campaign in mid-May with newspaper, TV and radio advertising, as well as billboards. Participants continue to work with their local elected officials, law enforcement, and fire departments to help them understand that backyard trash burning is illegal and dangerous. Six public forums have been held to-date: Southern Indiana Recycling Initiative, Household Hazardous Waste Task Force, City of Rockport, City Bicknell, Crawford County Commissioners, and Spencer County Commissioners.

#### 2.12.1.5.

#### **Coalition Building – Partnering with Universities on Research and Technical Issues**

Lead Office: OPPTA

#### **Establish Industrial Pollution Prevention Internships**

Work with Human Resources to consider the development of an internship program with OPPTA/CMTI. Work with Clean Manufacturing Technology Institute (CMTI) to evaluate the possibility of a college pollution prevention internship program. This program would allow engineering students to assess participating facilities for pollution prevention opportunities.

By: 6/30/04

Percent Complete  
100%

Status:

The Office Pollution Prevention Technical Assistance (OPPTA) has met with Human Resources to discuss the possibility of Pollution Prevention (P2) Internships. The resulting discussions found that if no federal grant is received for the program, interns would be hired as "Unpaid Interns". OPPTA did apply for and secure a summer intern with the Governor's Intern Program. This intern worked within OPPTA to assist in planning the Annual P2 Conference and also researched P2 Training Materials for Agency Staff.

Further research and discussions have been held with the Clean Manufacturing Technology Institute (CMTI) to determine feasibility of an on-going P2 internship program. CMTI is interested in pursuing this opportunity and has been working with OPPTA to research other state P2 Internship programs. Human Resources contacted Purdue University to determine the interest in an "Unpaid Intern" program with their School of Engineering. There is an interest from Purdue for unpaid interns.

The Indiana Department of Environmental Management is therefore interested in pursuing this further and will consider applying for a Pollution Prevention Incentives for States grant in the next biennium to fund this project for the first 2 years and work with another entity such as CMTI or the Purdue University Advanced Technology Center to fully implement and provide on-going management and funding of a P2 intern program.

#### 2.12.1.6.

#### **Maintain Essential Environmental Services - Coordinate C/E and Compliance and Technical Assistance Program (CTAP) Programs**

Lead Office: OPPTA

Develop mechanism through C/E Team to advise Compliance and Technical Assistance Program (CTAP) program on areas of regulatory compliance that are consistently not adhered to and/or areas of upcoming regulations that will impact small businesses.

By: 9/1/03

Percent Complete  
100%

Status:  
Compliance and Technical Assistance Program (CTAP) staff reviewed the Office of Enforcement biweekly reports. An Excel spreadsheet was developed for each of the media that listed the violations of companies back to January 1, 2003. Each spreadsheet has been sorted to show the Top 10 violations in each of the different program areas. The spreadsheets were shared with the program areas during the June 14, 2004 Compliance Enforcement (C/E) Team meeting. C/E Team members were asked to provide CTAP with a list of potential outreach opportunities for both areas of current non-compliance and future environmental rulemakings.

Utilize Compliance and Technical Assistance Program (CTAP) resources in developing compliance assistance tools and providing outreach on new regulations or problem areas for small businesses.

By: 7/1/05

Percent Complete  
50%

Status:  
See above.

Develop referral process to Compliance and Technical Assistance Program (CTAP) for small businesses recently inspected with findings of deficiencies that Compliance and Technical Assistance Program (CTAP) staff can assist with coming back into compliance.

By: 7/1/05

Percent Complete  
50%

Status:  
See update provided in 2 sections above..

**2.12.1.7.**

**Maintain Essential Environmental Services - Enhance and coordinate IDEM's assistance to small-regulated entities through the Compliance and Enforcement Team.**

Lead Office:  
OPPTA

The compliance/enforcement team provides a centralized mechanism for a coordinated effort to define, implement and allocate assistance resources (i.e. financial, compliance, technical, regulatory development and regulatory outreach) for small business and other small regulated entities. The Compliance and Enforcement Team's attention to these various media efforts will lead to a more efficient use of existing resources in implementing priority assistance efforts.

**2.12.1.8.****Maintain Essential Environmental Services and Deliver Services in an Efficient Manner as Practical**

Develop a plan to encourage Toxic Release Inventory Reporters to utilize electronic reporting with the TRI-ME software. Research current number of hard copy reports submitted.

By: 12/31/03

Percent Complete  
100%

Status:

Complete: 160 facilities were identified for submitting hard copy 2002 Toxic Release Inventory reports. Of those, 74 used an electronic method of completing the form, but did not submit the form electronically. They were called and asked to submit the electronic versions of their forms. All but 14 complied and submitted their electronic reports.

The remaining 86 facilities completed hard copies by hand. These facilities were contacted through a survey and asked if they were interested in participating in a workshop on how to use the TRI-ME software. There was very little interest to participate, therefore no workshop was held.

A Toxic Release Inventory (TRI) listserv has been set up to provide monthly contact with reporters on tips for accurate reporting and using electronic software to submit reports.

Implement plan

By: 1/31/04

Percent Complete  
100%

Status:

74 facilities were individually contacted and asked to resubmit their 2002 Toxic Release Inventory (TRI) forms electronically. We had an 81% response rate. The Indiana Department of Environmental Management was required to hand enter all the hard copies in which a facility did not respond. Further outreach is planned as described above.

A Toxic Release Inventory (TRI) workshop survey was taken asking about the type of workshops reporters would be interested in attending, locations, times of year, etc. The survey had a 13% response rate. Based on these results, 2 classroom style TRI workshops were held in April where attendees were given a TRI reporting refresher and encouraged to submit reports electronically. Workshop info was mailed to over 1000 TRI reporters. Workshop information is available on the web at: [www.in.gov/idem/oppta/tri/workshops.html](http://www.in.gov/idem/oppta/tri/workshops.html).

In addition to the TRI Listserv, Office of Pollution Prevention and Technical Assistance (OPPTA) has begun developing and distributing a TRI newsletter. The newsletter will stress the importance of reporting electronically. It is available on the web at: [www.in.gov/idem/oppta/tri/newsletter/](http://www.in.gov/idem/oppta/tri/newsletter/).

Measure effectiveness.

By: 7/1/05

Percent Complete  
50%

Status:

Indiana Department of Environmental Management (IDEM) is currently in the process of receiving approximately 4,000 Form Rs throughout June and July for 2003 data. In August, IDEM will evaluate the number of hard copies and begin contacting the facilities to resubmit electronically. Over 300 facilities submitted hard copy versions of their Toxic Release Inventory (TRI) forms for reporting year 2001. For reporting year 2002, this number decreased by half, approximately 150 facilities submitted hard copies. Of that 150, Office of Pollution Prevention and Technical Assistance (OPPTA) contacted 74 facilities that had completed the forms electronically but did not submit an electronic version. Over 62 facilities that were contacted provided the electronic versions of their reports. Therefore, for reporting year 2002, approximately 85 to 90 facilities submitted hard copies. This is a decrease of about 70%.

#### **2.12.1.9. Prioritize Services and Programs**

Assess current systems for prioritizing the work in each branch area; revise or establish systems as needed to set priorities.

By: 12/31/03

Percent Complete  
50%

Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA) utilizes the environmental performance partnership agreement as a planning and priority-setting dialogue between its staff, managers, and assistant commissioner. This exercise is conducted on a biennial basis. Progress is monitored/tracked utilizing the EnPPA through quarterly update process.

Conduct semi-annual review of ongoing activities to ensure that work continues to be prioritized to provide efficient and effective services and is oriented towards making a significant difference in environmental quality improvement and protection.

Ongoing through 6/30/05 with semi-annual reviews occurring by 12/31/03; 6/30/04; 12/31/04; and 6/30/05

Percent Complete  
50%

Status:

Through this activity-based reporting, the quarterly updates to the EnPPA, The Office of Pollution Prevention and Technical Assistance (OPPTA) measures both fulfillment of its commitments under the agreement and provides the information to analyze the effectiveness of different approaches to environmental protection. Basic program performance and fiscal responsibilities are monitored, through progress discussion between the Branch Chiefs and Assistant Commissioner on a quarterly basis. The information provided by the office may be evaluated on a semi-annual basis through presentation and discussion among the Indiana Department of Environmental Management (IDEM) senior management and the commissioner at Senior Staff meetings.

#### **2.12.1.10. Risk Advisory Committee**

Lead Office: OPA

EPA Role: Provide data and information related to priority chemicals, contaminants, areas and categories.

The Risk Advisory Committee will continue its efforts, based on available resources and research compiled over the past two years, to explore chemicals and pollutants of concern and how best to achieve their reduction. The Risk Advisory Committee will also look at several different sectors and areas within Indiana that may have higher levels of key known threats to human health based on previous research.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA) has a contact for this committee. Although we were not requested to attend any meetings during this quarter, the 2001 and 2002 Toxic Release Inventory (TRI) data is quality assured and available for the Committee to use. When asked, we are available to sort this data geographically, by chemical, etc for analysis by the Committee.

Lead by OPA, IDEM program offices, OAQ, OLQ, OWQ and OPPTA, will work to:

Identify specific chemicals, contaminants, areas and categories for the priority pollutant/toxic list

By: 12/30/03

Percent Complete  
0%

Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA) developed a list of the top agency priority pollutants/toxics based on data reports from each office. This has not been approved for Risk purposes though. Office of Policy and Assessment (OPA) is leading this project. No meetings have been scheduled. OPPTA trended chemicals reported to TRI and described major changes and potential causes. Dichloromethane, Indiana's #2 reported carcinogen last year, was the main chemical of interest. It has seen a 92% reduction since its all time high in 1992. This is due to agency outreach efforts and a federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) that went into effect in 2001. This year, dichloromethane dropped to a #6 ranking.

Develop a process to make better risk-based decisions and allocation of resources

By: 6/30/04

Percent Complete  
0%

Status:

No activity this quarter. Office of Policy and Assessment (OPA) is leading this project. No meetings have been scheduled.

Assist other IDEM offices in addressing their priority contaminants

By: 6/30/05

Percent Complete  
50%

## Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA) provided Toxic Release Inventory (TRI) data and rankings to other IDEM offices through presentations to senior staff and data as requested to specific offices including Air Quality and Planning and Assessment.

Participate in agency-wide meetings

through 6/30/05

## Percent Complete

0%

## Status:

No activity this quarter. Office of Policy and Assessment (OPA) is leading this project. No meetings have been scheduled.

**2.12.1.11.****Reducing Key Environmental Threats – Enviro-School Program**

Lead Office: OPA

EPA Role: Provide funding and guidance.

Partner with EPA, Indiana State Department of Health, Indiana Department of Education, State School Board Association, Indiana-Purdue University to develop the Environmental Management System (EMS) or the Enviro-School program that would ensure a healthy school environment for children.

Due Date / Through: 6/30/05

## Percent Complete

30%

## Status:

The Office of Planning and Assessment, along with the review committee for this project, met to review the 4 project proposals from outside firms. A recommendation was made to award the grant dollars to the Environmental Management Institute. The contact for the Office of Pollution Prevention and Technical Assistance (OPPTA) on this project will be leaving July 12 to work in the Drinking Water Branch. Mark Stoddard of OPPTA will take over work in this area for OPPTA..

**2.12.2. Office Priorities****2.12.2.1.**

PPG (Y/N): N

**Assist the divisions of air, water and land in identifying, within planned and existing regulatory programs, obstacles to pollution prevention and opportunities to promote and assist in pollution prevention.**

EPA Role: Coordination with EPA on SEP and pollution prevention integration projects.

(1) Develop and implement a plan to review all first rule notices for the Indiana Department of Environmental Management (IDEM) for pollution prevention opportunities. Plan will include a system for forwarding rules with potential pollution prevention opportunities to the Partners for Pollution Prevention (P4P2) for consideration to comment.

By: 7/1/04

## Percent Complete

100%



Status:

(1) A Current Operating Procedure (COP) has been developed as a plan for reviewing first notices.

(1)(a) Pollution prevention staff have been attending rule planning meetings in various offices. Staff have been involved in the planning meeting for the Office of Water Quality's (OWQ) Antidegradation rule and the Mercury Triennial Review. Staff have recently begun to work with Office of Air Quality regarding new boiler Maximum Achievable Control Technology (MACT). We have committed to help on initial notification and other outreach opportunities.

(1)(b) Pollution Prevention (P2) staff review first notices on a monthly basis and participate in appropriate meetings for those rules where P2 possibilities exist.

(1)(c) The Office of Pollution Prevention and Technical Assistance (OPPTA) staff attend initial rule meetings when appropriate.

(1)(d) OPPTA staff review first notices on a monthly basis and provide comments to the appropriate office when P2 opportunities exist. We continue to work with Office of Air Quality (OAQ) on the reinforced plastics rule and the misc. metal and plastic parts rules, as they adopt the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and with the Office of Water Quality (OWQ) on the Mercury Reduction Rules. OPPTA continues to develop and post, on a monthly basis, the Indiana Register Environmental information. We work with the Partners for Pollution Prevention to review the first notices.

(2) We have received no requests for pollution prevention Supplemental Environmental Projects (SEP) determinations during this quarter.

(a) The Office of Pollution Prevention and Technical Assistance (OPPTA) will attend internal agency rule planning meetings.

(b) OPPTA will work with other IDEM offices to identify rules that provide Pollution Prevention (P2) opportunities.

(c) OPPTA will attend the initial rule meetings prior to publication of a 1st notice.

(d) OPPTA in cooperation with appropriate offices will review each of the rule projects to decide which rules provide P2 opportunities based on criteria such as: the number of industries impacted by the rule; the amount of emissions involved; and knowledge of P2 opportunities.

(2) Respond to requests from the Office of Enforcement (OE) for technical assistance on the determination of pollution prevention Supplemental Environmental Projects (SEPs) within seven working days. Work with the Environmental Protection Agency (EPA) to obtain examples of past SEPs.

#### 2.12.2.2.

PPG? (Y/N): N

#### **Work with existing environmental regulatory programs to make use of existing information-gathering systems that may assist the division in assessing the progress of pollution prevention statewide. (IC 13-27-2-5)**

EPA Role: Analyze Toxic Release Inventory data for pollution prevention, assistance and compliance/enforcement strategy for major Toxic Release Inventory increases; prioritize Toxic Release Inventory reported substances for future regulatory and non-regulatory consideration.

(1) Promote accurate voluntary reporting of Source Reduction Activity (SRA) Code reporting to Toxic Release Inventory (TRI) through increased educational efforts during TRI workshops and on the TRI website. This data may be useful in analyzing pollution prevention efforts throughout the state.

By: 6/30/04

Percent Complete  
100%

Status:

During workshops in May 2004 and through the TRI listserv and newsletters, reporters have been training and reminded to provide accurate Source Reduction Activity (SRA) info on the Toxic Release Inventory (TRI) Forms. In November 2003, the Office of Pollution Prevention and Technical Assistance (OPPTA) staff began analyzing the 2002 TRI data for SRA to determine how many facilities complete this section and how we can best use the data. During workshops, phone calls, and through quality assurance letters, accurate reporting of the SRA is emphasized.

- (2) Log TRI Form R's received and enter the information into the database.

By: 8/15 of each year for forms postmarked by July 1

Percent Complete  
90%

Status:

All 2002 forms have been logged. 90% of the Toxic Release Inventory (TRI) forms have been logged for 2003.

- (3) File all Form R's in appropriate locations with the TRI file room.

By: 8/30 of each year for forms postmarked by July 1

Percent Complete  
75%

Status:

2002 forms have been filed in the appropriate locations. 90% of the TRI 2003 forms have been filed in the appropriate location.

- (4) Quality assure and effectively communicate Toxic Release Inventory (TRI) data.

By: May 31 of each year

Percent Complete  
50%

Status:

For 2003, we are not yet in the time frame to begin this. Quality Assurance for 2002 forms are complete, and the database is locked down. For 2002 forms, 664 quality assurance letters were mailed to facilities where data indicated there may have been mistakes. These letters were mailed October 1, 2003. Over 600 letters received responses, for more than a 93% response rate. In December 2003, the Office of Pollution Prevention and Technical Assistance (OPPTA) received data from EPA and began the state reconciliation process for 2002 data.

- (5) Release data through a formal Indiana Department of Environmental Management (IDEM) press release, in "Indiana's Annual State of the Environment Report" and the IDEM TRI web site on the Internet.

By: June 30 of each year

Percent Complete  
50%

Status:  
Press release occurred on June 23<sup>rd</sup> and coincided with EPA's press release. Press release materials are available on the web at [www.in.gov/idem/oppta/tri](http://www.in.gov/idem/oppta/tri). All Toxic Release Inventory (TRI) data for 2002 has been submitted for incorporation into the State of the Environment Report.

- (6) Maintain Indiana searchable TRI website.

By: Ongoing

Percent Complete  
50%

Status:  
2002 data is available on the Toxic Release Inventory (TRI) website. Not yet in timeframe for 2003 data.

- (7) Provide TRI data upon request to internal and external customers.

By: Ongoing

Percent Complete  
50%

Status:  
Responses are provided upon request.

- (8) When possible, work with program offices to develop a mechanism to address sectors with large impact on TRI if other voluntary pollution prevention efforts fail.

By: Ongoing

Percent Complete  
50%

Status:  
Specific sector information was provided in the 2002 and 2001 Toxic Release Inventory (TRI) press releases. Data is provided to other offices as requested. This information is available to the Risk Advisory Committee. The Office of Air Quality (OAQ) analyzes the data each year and the Office of Pollution Prevention and Technical Assistance (OPPTA) made presentations to various Indiana Department of Environmental Management (IDEM) staff to encourage the use of TRI data. Office of Policy and Assessment (OPA) also requested data for outreach to utilities. TRI data was utilized in October 2003 to create a fact sheet for foundries, asking them to take steps to reduce Persistent Bioaccumulative Toxics (PBT) wastes and to join the EPA Waste Minimization Program.

- (a) Utilize TRI release data to identify the top 20 to 50 TRI reporters having the most significant impact on state TRI air and water release totals:

Identify the top 100 TRI release reporters and from there remove:

Facilities that are impacted by a significant regulatory driver within the next year (i.e., June 2004).

Facilities that are included in the new TRI reporting sectors starting in RY 1998.

By: June 30 of each year

Percent Complete  
50%

Status:  
2002 Toxic Release Inventory (TRI) data was analyzed. Reports were run for Styrene and Dichloromethane as well as Source Reduction Activity (SRA) and Persistent Bioaccumulative Toxics (PBTs). Fact sheets have been created based on top PBT releasing sectors in Indiana.

- (b) Utilize TRI release data to identify the top ten most significant chemicals reported to TRI.

Identify facilities associated with the releases of the top ten chemicals.

By: June 30 of each year

Percent Complete  
50%

Status:  
2002 releases have been identified. Not yet in the time frame for 2003

- (c) Make available the TRI reporters' data to all agency programs.

By: June 30 of each year

Percent Complete  
50%

Status:  
2002 data is available. Not yet in time frame for 2003 data.

- (d) Communicate data on persistent, bioaccumulative toxic substance reported to TRI.

By: June 30 of each year

Percent Complete  
50%

Status:  
A report will be submitted to EPA Region 5 as part of a pollution prevention grant. Persistent Bioaccumulative Toxics (PBT) data was also be reported in a Q & A document released in June. Not yet in time frame for 2003 data.

- (9) Work with Indiana Department of Environmental Management (IDEM) Information Technology to convert the existing Toxic Release Inventory (TRI) database into an agency approved platform.

- (a) Scope of work for conversion completed.

By: 6/1/03

Percent Complete  
100%

Status:  
Scope of work was completed.

- (b) Project proposal to be presented to Data Management Team (DMT)

By: 7/1/03

Percent Complete  
100%

Status:  
Presented and approved by the Data Management Team (DMT).

- (c) RY 2001 data converted to new platform.

By: 12/31/03

Percent Complete  
100%

Status:  
Access 97 was used as the primary platform for 2001 and Access 2000 in the Windows XP format has become the platform of choice from this point forward.

- (d) Remaining reporting years data, including RY 2002, converted to new platform.

By: 3/1/04

Percent Complete  
100%

Status:  
Although initially 100% by this timeframe, review of the new database showed that significant portions of data were missing due to poor quality of old data. This process had to begin again.

- (e) Beta test of Toxic Release Inventory database

By: 4/1/04

Percent Complete  
100%

Status:  
Database was beta tested and found to be unusable. Project has begun from scratch again.

- (f) Implementation phase or full scale testing

Beginning: 5/31/04

Percent Complete  
0%

Status:  
See problems described above. Time frames will need to be adjusted.

- (g) Production rollout

By: 6/1/04

Percent Complete  
0%

Status:  
See problems described above.

- (h) Begin to use the newly developed TRI database system for data entry and quality assurance of the RY 2003 data to be received.

By: 7/1/04

Percent Complete  
0%

Status:  
See problems described above.

- (i) Final review phase completed

By: 8/1/04

Percent Complete  
0%

Status:  
See problems described above.

- (10) Prepare all TRI reports from 1995 – 1998 and send them to the Commission on Public Records for microfilming

By: 7/1/04

Percent Complete  
100%

Status:  
1995 - 1998 Toxic Release Inventory (TRI) reports have been microfilmed.

- (11) Participate in the Data Management Team (DMT).

- (a) Attend DMT meetings.

By: Quarterly — at a minimum

Percent Complete  
50%

Status:  
The Office of Pollution Prevention and Technical Assistance (OPPTA) office data contact has been attending the Data Management Team meetings on a monthly basis.

- (b) Review and comment on documentation guiding and supporting the Agency Data Integration priority.

Ongoing

Percent Complete  
50%

Status:  
The Office of Pollution Prevention (OPPTA) office data contact has been attending data standards meetings and assisting in updating the data management guide.

- (c) Review and comment on project proposals for offices moving databases into Oracle and other Indiana Department of Environmental Management (IDEM) approved platforms.

Ongoing

Percent Complete  
50%

Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA) office data contact has been attending the Data Management Team (DMT) meetings on a monthly basis, where proposals are reviewed and commented on. To-date, the OPPTA office data contact presented to DMT and obtained approval for: Compliance and Technical Assistance Program (CTAP) Maintenance, Toxic Release Inventory (TRI) Paradox Conversions, and the Agency Locator List (currently still in planning stages). He is also currently pursuing TRI as a pilot project for e-signatures. We have begun conversations with EPA and with DMT to discuss this possibility. The OPPTA office data contact has been designated as the contact for managing OPPTA software. During this past term, he was the OPPTA Windows XP External Tester to prepare our office as we switch to Windows XP.

- (12) Participate in Agency GIS (Geographic Information Systems) Workgroup. Serving in an advisory capacity, review and comment on policies and procedures.

Ongoing

Percent Complete  
50%

Status:

The Office of Pollution Prevention and Technical Assistance (OPPTA's) office data contact participates in these meetings.

**2.12.2.3.**

**Evaluate national recycling/diversion methodology to compare national strategy to the state of Indiana strategy**

EPA Role: Coordinate with US EPA regarding potential programmatic and regulatory models in other state that have implemented the EPA model.

- (1) Identify Indiana hurdles to implementing the national recycling/diversion calculations.
- (a) Produce a document outlining the comparisons.

By: 6/30/04

Percent Complete  
50%.

Status:

Ongoing. Discussions continue between the Office of Land Quality (OLQ) and the Office of Pollution Prevention and Technical Assistance (OPPTA). Researching and evaluating calculations developed by EPA and other states. Based on EPA's guide, in order to develop a valid, sustainable, accurate recycling rate we will need an accurate, direct reportage of tons of materials removed from the Main Stream Waste (MSW) stream for recycling, and will either need the authority to request this information or have access to the data of an agency who has this authority. Thus any changes in calculating the percent of diversion appears to require a legislative change to obtain the data. Will be sharing findings with the Office of Land Quality (OLQ) and the Office of Pollution Prevention and Technical Assistance (OPPTA) senior staff for their recommendations.

- (b) Implement the national recycling/diversion calculations, if data is available and senior staff determines it to be a priority.

Percent Complete  
0%.

Status:  
Dependent on above.

### 2.12.3. Compliance Assistance Branch

The Office of Voluntary Compliance (OVC) is the Indiana small business assistance program. We assist regulated entities in achieving compliance and promoting cooperation between the Indiana Department of Environmental Management and regulated entities. Outreach efforts consist of providing assistance to inquiries; developing compliance manuals, developing recognition programs, assistance brochures, fact sheets and conducting educational workshops. To effectively provide the type of assistance that may be required by the regulated community, the Office of Voluntary Compliance employees maintain a strict confidentiality policy.

Measuring compliance assistance activities:

Office of Voluntary Compliance (OVC) administers the Compliance and Technical Assistance Program (Compliance and Technical Assistance Program (CTAP)). OPPTA Compliance and Technical Assistance Program (CTAP) constructed a database, customer satisfaction survey and site visit survey to quantitatively measure results with regard to Compliance and Technical Assistance Program activities. Information gleaned from the database is screened to remove confidential information, as required per IC 13-28-3-4.

**Compliance and Technical Assistance Program activities are measured with the following three tools:**

#### 1. Database

The database contains information on all Compliance and Technical Assistance Program activities. Standard Compliance and Technical Assistance Program activities include phone assistance, on-site assistance and workshops/presentations.

#### 2. Customer Satisfaction Survey

The customer satisfaction survey (available at [www.in.gov/idem/oppta/survey.html](http://www.in.gov/idem/oppta/survey.html)), measures how effectively Compliance and Technical Assistance Program (CTAP) provides customer service. Surveys submitted are entered into the Compliance and Technical Assistance Program (CTAP) database. A summary report is produced to track overall customer satisfaction.

#### 3. Site visit survey

The site visit survey (available at [www.in.gov/idem/ctap/survey](http://www.in.gov/idem/ctap/survey)) measures the economic and environmental (compliance) impact of Compliance and Technical Assistance Program (CTAP) compliance and/or pollution prevention site visits. Submitted surveys are entered into the Compliance and Technical Assistance Program (CTAP) database, where a summary report is produced.

#### 2.12.3.1.

**Compliance Assistance: Continue Office of Voluntary Compliance (OVC)/Compliance and Technical Assistance Program (Compliance and Technical Assistance Program (CTAP)) to assist regulated entities in achieving regulatory compliance and promote cooperation between the department and regulated entities. (IC 13-28-1-2)**

PPG? (Y/N):  
N



(1) Provide high quality compliance assistance to all callers who are referred to the Office of Pollution Prevention and Technical Assistance (OPPTA) phone assistance team to increase the number of true confidential assistance calls.

(a) Redistribute and/or evaluate the phone assistance team routing form annually.

By: 8/31/03 and 8/31/04

Percent Complete  
100%

Status:  
The phone assistance team routing form was reviewed and revised. The revised form was given to operations staff for use at the front desk.

(b) Continue totaling calls and site visits from Compliance and Technical Assistance Program (CTAP) database every two weeks and report in OVC Bi-weekly.

Percent Complete  
50%

Status:  
Calls and site visits were totaled and provided in the Office of Voluntary Compliance (OVC) biweekly every 2 weeks.

(c) Monitor employee use and evaluate responses in Compliance and Technical Assistance Program (CTAP) database through monthly report runs.

Percent Complete  
50%

Status:  
Monthly reports for staff were submitted to managers for review every month of this quarter.

(d) Review and edit Compliance and Technical Assistance Program (CTAP) database Current Operating Procedures and instructions for using the Compliance and Technical Assistance Program (CTAP) database.

By: 9/30/03 and 9/30/04

Percent Complete  
100%

Status:  
Instructions on the most recent changes to the Compliance and Technical Assistance Program (CTAP) database were developed and provided to all Compliance and Technical Assistance Program staff through varying methods. New staff were provided instruction during their database training. Existing staff were notified of the changes via email.

#### **2.12.3.2.**

#### **Continue to work with U.S. EPA on implementing the National Performance Track Program.**

EPA Role: Set up site visits and work with IDEM on securing potential funding and necessary resources to implement regulatory benefits to Indiana Performance Track members.

(1) Continue working with the Compliance Enforcement Team in reviewing compliance performance by Indiana applicants to the program.

- (2) Submit recommendations as to whether each applicant merits entrance into the program based on compliance history.

By: 12/31/03; 6/30/04; 12/31/04 and 6/30/05

Percent Complete

50% - ongoing.

Status:

No applications from Indiana facilities were submitted for latest round.

- (3) Coordinate with the Environmental Protection Agency (EPA) on performing site visits relating to the facilities Environmental Management System.

Ongoing

Percent Complete

50%

Status:

No site visits requested from EPA this quarter.

- (4) Working with Senior Staff and the Compliance Enforcement Team, consider the regulatory flexibility and the “no routine” compliance inspections ideas from EPA and implement if feasible and desirable.

Ongoing

Percent Complete

50%

Status:

EPA finalized the first round of regulatory flexibility for the National Performance Track members. The project manager contacted Indiana facilities that could be eligible for the incentives. At this time, none of the facilities were planning on taking advantage of the incentives.

## 2.13. Office of Water Quality

The quality of Indiana's surface water and drinking water has vastly improved in the past few decades. However, on the 2002 303(d) list Indiana has 428 documented impaired waterbodies and some streams have yet to be adequately characterized. Indiana still has some drinking water providers that do not provide safe water 100% of the time. Also, Indiana has lost about 85% of the valuable wetlands that serve to enhance water quality.

### Office Contact

Tim Method  
Deputy Commissioner  
Office of Water Quality  
(317) 233-1210  
e-mail: tmethod@dem.state.in.us

### 2.13.1. Agency Priorities

#### 2.13.1.1.

#### Building a Better IDEM – Centralized Web Development

Lead Office: MACS/OMBA-BSD

Designate staff to act as "Content Managers" to represent their respective office. Each content manager will be responsible for ensuring that materials posted to the Web from their office are appropriate and current, and will assist staff within their office in posting new content. Agency staff will also need to assist the Web team as areas of the site are reevaluated and reorganized to make information more readily available to the public.

Assist in providing the necessary Full Time Equivalencies (FTEs) to fill the required Web team positions. Program areas will also need to transfer all Web development tools and software/hardware to MACS.

Share information on office publications for use in the on-line publication catalog/archive.

#### 2.13.1.2.

#### Building a Better IDEM – Agency Data Integration / Data Management Team

Lead Office: OMBA-BSD

The Office Data Contact (ODC) will actively participate in data management team meetings and activities regarding the agency's data integration effort. Bring all data projects to the Data Management Team for consideration. ODC will also be responsible for ensuring that agency data stewardship training policies are met for existing and new staff whose job positions entail data entry and maintenance

Ongoing through 6/30/05

Percent Complete

37.5

Status:

Ongoing activity.

#### 2.13.1.3.

#### Building a Better IDEM – Establish Facility Registry System (I-FRS)

Lead Office: OPA/OMBA-BSD

Map drinking Water database to I-FRS.

Ongoing through 6/30/05

Percent Complete  
37.5

Status:  
Working with SAIC to create system and documentation. Data steward training is contingent upon implementation of Indiana facility Registry System.

#### **2.13.1.4. Building a Better IDEM – Geography Network**

Lead Office: OMBA-BSD

Participate in GIS data inventory and in drafting and implementing a metadata development plan.

By: 10/01/03

Percent Complete  
37.5

Status:  
Ongoing

#### **2.13.1.5. Building a Better IDEM – Address Quality Issues – Quality Management Plan**

Lead Office: OPA

Actively participate in the Region 5 State Science Council efforts as well as the IDEM 'peer review' panel development and implementation processes.

Ongoing through 6/30/05

Percent Complete  
37.5

Status:  
Ongoing

#### **2.13.1.6. Building a Better IDEM - Records Management**

Lead Office: OLC

Ensure records currently considered public and to be disclosed upon request do not enhance opportunities for terrorist strikes.

Ongoing

Percent Complete  
60% for Drinking Water which will be a model for other programs

**Status:**

House Enrolled Act 1935 was enacted by the legislature giving the ability to keep confidential, public records that contain information found in or relating to vulnerability assessments and other emergency response documents. Staff are working with Office of Legal Counsel, and the Counter-Terrorism & Security Council to develop guidance on justifiable waivers to confidentiality and how to reconcile possible conflicts with other laws and requirements such as Environmental Impact Statements required by NEPA and the Wellhead Protection Program. Draft guidelines have been developed and tested for full implementation. In addition to waivers of confidentiality, discussions have taken place with stakeholders regarding the development of an employee confidentiality statement/certification to insure all Indiana employees that may have access to confidential information do not improperly transmit such information. The system is currently being tested with a legal discovery request for information. Additional procedures are being developed to address such requests. Requests for Source Water Protection Area information are being screened and a new interactive web site has been developed to provide access to information to determine whether a particular site is located in a source water protection area without pinpointing actual well or intake locations.

**2.13.1.7.****Maintain Essential Environmental Services – Agency-Wide Permit Team**

Lead Office: Deputy Commissioner / OPA

Work with the Permit Team to enhance efforts to ensure timely and effective permit service utilizing a multi-media group. An agency-wide Permit Team, similar to the Compliance/Enforcement Team, made up of representatives from each office can focus on ways to improve our permit service. Examples include coordination of permit actions where appropriate, identifying ways to streamline or improve our current processes and procedures and using our collective existing resources as efficiently as possible.

Ongoing through 6/30/05

**Percent Complete**

50%

**Status:**

Group has been assembled and monthly meetings are held. Workplan developed in the form of a continuously updated topical listing.

**2.13.1.8.****Maintain Essential Environmental Services – Internet Public Notice Standardization**

Lead Office: OPA

Participate in workgroup. Assist OPA in the standardization of public notice information posted via the Internet

Ongoing through 6/30/05

**Percent Complete**

0%

**Status:**

Not yet started. This topic will be addressed by the Permit Team (above).

**2.13.1.9.****Maintain Essential Environmental Services – Compliance / Enforcement Team**

Lead Office: OE

Routinely participate in CE Team meetings and other activities of this group, and disseminate information obtained during these meetings back to other program office staff.

**2.13.1.10.****Maintain Essential Environmental Services - Stormwater Enforcement Strategy**

Lead Office: OWQ

Develop a strategy for enforcing stormwater phase II requirements.

By: 9/30/04

Percent Complete

75%

Status:

Permits and Compliance branch staff have formulated an enforcement referral approach that is consistent with the ERP for phase II MS4 communities. This approach is now being implemented. Notification letters for Rule 13, Part A have been sent to entities. Deficiency letters for Rule 13, Part B submittals have been sent to entities. For Rule 6, a notification letter template has been developed. Violation letter templates have been developed as well. A strategy has been formulated for follow-up/inspection of MS4 communities that have requested waivers from the rule as well as for Rule 6 No Exposure Exclusions. The next step is to develop targets for compliance inspections for Rule 13

**2.13.1.11.****Reduce Key Environmental Threats – Drinking Water Infrastructure & Security**

Lead Office: OWQ

As part of its goal to keep Hoosiers from harm, IDEM will address issues of homeland security by:

Filling a newly created position dedicated to drinking water security and infrastructure protection.

The OWQ Security coordinator will work in concert with key staff in OLQ and OAQ, as needed, to ensure that the agency participates effectively in the state's counter-terrorism efforts.

Ongoing

Percent Complete

100%

Status:

A Security and Counter-Terrorism Coordinator was hired in July 2003. Over the reporting period, this coordinator has attended the following training: Risk Assessment Model-Water (RAM-W), Vulnerability Self Assessment Test (VSAT), National Rural Water Association (NRWA) Self Assessment, and Emergency Response Plans for large systems

Coordinate IDEM's interactions with other federal, State and local agencies on matters relating to security and infrastructure protection.

Ongoing

Percent Complete  
50%

Status:

The Counter-Terrorism (C-T) Coordinator has attended 2 formal Counter-Terrorism Security Council (C-TASC) meetings and has participated in a meeting of Lake Michigan military, and law enforcement personnel about lake drinking water intake protection as well as shoreline industry and recreational facilities. The C-T Coordinator has participated in a briefing by the US Attorney regarding the USA Patriot Act as well as a conference of C-T Coordinators and Law Enforcement on Domestic Terrorism. The C-T Coordinator continues to interact with C-TASC and the Indiana State Department of Health specifically on drinking water issues. The C-T Coordinator coordinates with the State Emergency Management Agency (SEMA) on water security matters regarding the development and implementation of the State's Comprehensive Emergency Management Plan. The C-T Coordinator is the Water Sector Gatekeeper for the newly activated Indiana Alert Network which is an interactive network of critical infrastructure stakeholders, emergency management, law enforcement, and security agencies. The coordinator serves on the Agriculture Bioterrorism Task Force.

Be the point of contact for matters relating to infrastructure security.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

The Counter-Terrorism (C-T) Coordinator attends monthly Counter-Terrorism & Security Council (C-TASC) meetings and participates in a meetings of Lake Michigan military, and law enforcement personnel about lake drinking water intake protection as well as shoreline industry and recreational facilities. The C-T Coordinator has participated in a briefing by the US Attorney regarding the USA Patriot Act as well as a conference of C-T Coordinators and Law Enforcement on Domestic Terrorism. The C-T Coordinator continues to interact with C-TASC and the Indiana State Department of Health specifically on drinking water issues

**2.13.1.12.**

**Reduce Key Environmental Threats – Coordinating with SEMA to develop and implement emergency response plans**

Lead Office: OLQ

Work with OLQ and SEMA to develop a drinking water system response protocol that will be incorporated into Indiana's Statewide Comprehensive Emergency Management Plan. The response protocol will be designed to address two important aspects of emergency planning and response. First, the protocol will address how specifically the State will respond to an incident, real or threatened, at a public water system. The second portion of the protocol will deal with the decision making process for determining what to communicate to the public and what steps to take regarding the safety and use of the drinking water based on the findings of the initial investigation.

By 1/1/04

Percent Complete  
70%

**Status:**

Vulnerability Assessment was conducted by Titan Corp staff to 30 select state staff in May 2004. Representatives of IDEM drinking water, emergency response, hazardous waste and enforcement programs, as well as the State Department of Health, and SEMA attended the training.

A CEMP workgroup has been formed and 2 meetings have been held with contractor Titan Corp. to develop a drinking water plan to respond to terrorist attacks. Draft documents have been produced and are under internal review. The final CEMP will be finished and presented to the Counter-Terrorism & Security Council by the end of the year.

**2.13.1.13.**

**Reduce Key Environmental Threats – Training drinking water staff, waste water staff, emergency response staff and SEMA staff in performing vulnerability assessments and emergency response planning.**

Lead Office: OWQ

Vulnerability assessments and emergency response planning:

Provide assistance to community systems serving over 3,300 population in meeting federal requirements. Report number of systems assisted quarterly.

Ongoing through 6/30/05

Percent Complete  
100%

**Status:**

Through the services of the Alliance of Indiana Rural Water Association, the National Rural Water Association state affiliate, all required vulnerability assessments were completed and submitted to EPA by the June 30, 2004 deadline

Provide assistance to community systems serving less than 3,300 population and non-community systems. Report number of systems assisted quarterly.

Ongoing through 6/30/05

Percent Complete  
0%

**Status:**

The Bioterrorism Act requires vulnerability assessments of all community water supplies be submitted to U.S. EPA by June 30, 2004, and Emergency Response Plans be developed or modified, and certification be sent to U.S. EPA 6 months after submittal of the VA. Once the required parts of the Bioterrorism Act are completed, resources will be shifted to assist communities less than 3,300

**2.13.1.14.**

**Reduce Key Environmental Threats – Reduce the potential for bioterrorism and ensure that there is an effective response should an incident occur.**

Lead Office: OWQ



Working with existing programs such as wastewater, hazardous waste, confined feeding and drinking water to develop strategies to protect existing facilities, reduce the potential for bioterrorism and ensure that there is an effective response should an incident occur.

Ongoing through 6/30/05

Percent Complete  
50%

Status:

The Counter-Terrorism Coordinator has established working relationships with all state counter-terrorism programs. The coordinator is a member of the Counter-Terrorism & Security Council and the Agricultural Bioterrorism Task Force. In addition, the coordinator serves on the ASDWA Terrorism committee. The coordinator is working to develop a training session to be incorporated into OSHA HAZWOPER training required for most of the IDEM field staff.

#### **2.13.1.15.**

##### **Prioritize Services & Programs – Address Most Significant Water Quality Issues**

EPA Role: Conduct an initial review and then periodically review to ensure that all areas of the Office are focused on highest, best use of staff time and resources to gain water quality improvements and most critical services to citizens.

#### **Focus Internal Resources to Address Most Significant Water Quality Issues**

Ensure that OWQ Priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting the water quality across the state.

Conduct a semi-annual review of OWQ activities to ensure that all work continues to be prioritized to provide efficient/effective services and is oriented toward making a significant difference in water quality improvement and protection. The review will include, at a minimum, a presentation by each branch chief on current activities and any planned changes to those activities to the OWQ senior management team. Adjustments as necessary will be made by the team.

By: 7/1/03 and biannually thereafter

Percent Complete  
25%

Status:

The Deputy Commissioner of Environmental Programs and the OWQ branch chiefs conducted A semi-annual review on January 29, 2004. Largely, the OWQ is on track with the EnPPA commitments. However, due to state legislation, a couple of issues were identified that should ultimately be revised in the EnPPA. These issues include the implementation of the state wetland regulatory permit program per HEA 1798, and regulation of small public water supplies. We anticipate these changes to the EnPPA to occur during the mid-term review on June 30, 2004.

#### **2.13.2. Office Priorities**

##### **2.13.2.1.**

##### **Progress On Restoring Impaired Waterways**

PPG (Y/N): Y

IDEM Office of Water Quality will continue to improve coordination of the various efforts aimed at removing impairments to Indiana's waterways. Staff and funding resources aimed at identifying impairments and targeting efforts to reduce contributions to impairments are limited. Our focus

will be to best leverage and prioritize all of our resources and current programs, with those of local watershed groups, community efforts, and other state and federal agencies (e.g., DNR, EPA and NRCS) to make measurable, rapid progress in improving the water quality of impaired water bodies. OWQ programs include Total Maximum Daily Load (TMDL), 305b/303d listings, watershed planning and implementation, water quality standards, wetlands, state revolving loan funds, National Pollutant Discharge Elimination System (NPDES), and water quality assessment and coordination with point source and groundwater and land cleanup programs. Tools will include organizational change, cross-functional teams, increased outreach and focused targeting of grant and loan funding and staff efforts. OWQ will also increase the use of external advisory groups to help shape water quality priorities and policies.

1. Realign existing agency staff as needed to more effectively use our human resources to accomplish an integrated watershed management approach.

a. Identify the best alignment of resources needed to accomplish an integrated watershed management approach

By: 7/31/03

Percent Complete  
100%

Status:

OWQ held a number of internal discussions with management and staff, and has determined the best alignment of resources needed to accomplish an integrated watershed management approach.

This includes evaluating OWQ staff skills and programs for TMDL, 305b/303d listings, watershed planning and implementation, water quality standards, and water quality assessment.

b. Based on the resource evaluation, develop and implement a strategy to reassign OWQ programs and/or staff to the OWQ branches and sections determined to be most appropriate for accomplishing an integrated watershed management approach.

By: 9/30/03

Percent Complete  
100%

Status:

OWQ has worked through the logistical issues relative to moving staff from one location to another, and staff are now established in their new locations. OWQ continues the process of establishing new positions and filling vacant positions as necessary and appropriate.

2. Use existing qualitative and quantitative information and tools to best describe where we are now in terms of impairment and efforts to reduce impairments and work towards an integrated watershed management approach.

a. Evaluate and identify what resources are needed and what resources are available to utilize GIS tools to integrate pertinent information for water bodies, e.g., known point sources, potential sources of contamination, grant projects, active watershed groups, monitoring data, etc.

By: 12/31/03

Percent Complete  
65%

Status:  
OWQ staff have identified priority information to be integrated into GIS. Staff are working to identify source of key info. Work is still being done to identify resources to accomplish GIS integration. Information has been gathered on the most feasible option

- b. Develop a work plan to define actions needed to utilize GIS tools to integrate pertinent information for water bodies

By: 3/31/04

Percent Complete  
35%

Status:  
The focus of the work has been determined, and some elements of work to be completed have been identified, but plan to accomplish the work is still being developed. Information has been gathered on the most feasible option.

- c. Implement work plan (as resources are available) to utilize GIS tools to integrate pertinent information for water bodies

By: 6/30/05

Percent Complete  
0%

Status:  
This will be done when workplan is complete.

3. Coordinate OWQ's TMDL, water quality assessment, and watershed planning and implementation programs such that they work together towards an integrated watershed management approach.

EPA Role: Provide technical assistance as necessary and appropriate, on developing TMDL waste load allocations for National Pollutant Discharge Elimination System (NPDES) stormwater sources and developing effluent limits consistent with those waste load allocations.

- a. Develop coordination protocol to establish internal links between OWQ's TMDL, water quality assessment, and watershed planning and implementation programs

By: 12/30/03

Percent Complete  
55%

Status:  
OWQ has worked to establish linkages between programs. Watershed management plans are being reviewed to determine progress on reducing impairments on 303(d) listed waters. 319 grant proposals are being prioritized for reducing impairments on 303(d) listed waters. Training has been given on load reduction approaches for assessment, TMDL and watershed staff. Staff are being familiarized with the revised assessment strategy. OWQ has hired a manager to help establish and drive the specifics of this coordination process. IDEM has hired 4 Watershed Specialist positions - these will serve as liaisons between programs for their assigned basin(s).

The coordination protocol will establish the structure necessary to:

- Integrate TMDL assessment work with water quality monitoring strategy implementation to leverage data collection resources.

- Prioritize the allocation of CWA grant program dollars, as appropriate, to assist in the development of watershed management plans and TMDLs.
- b. Utilize coordination protocol to share, verify, and validate existing qualitative and quantitative information related to impairments and impairment reductions.
- c. Utilize coordination protocol to prioritize future impairment reduction efforts.
- d. Improve the timeliness and quality of TMDL development through optimal use of all existing resources.
- Integrate TMDL assessment work with water quality monitoring strategy implementation to leverage data collection resources

By: 9/30/03

Percent Complete  
25%

Status:

Discussions on how best to do this are progressing. Staff are being familiarized with the revised assessment strategy. Staff are reevaluating TMDL data needs to best prioritize limited assessment resource. Discussions on how to fund critical assessment infrastructure projects continue.

- Prioritize the allocation of section 319 CWA grant program dollars, as appropriate, to assist the development and implementation of TMDLs.

By: 2005 award cycle

Percent Complete  
40%

Status:

2004 project proposal evaluations considering progress on restoring impaired waters identified on the 303(d) list have been submitted to USEPA for review. A workplan for 2005 is under internal review.

- Consult with IDEM's TMDL Advisory Group on TMDL approaches.

Ongoing

Percent Complete  
Ongoing

Status:

The TMDL Advisory Group meets bi-monthly to discuss and help direct OWQ's approaches to accomplishing TMDLs. The Group has given positive feedback on IDEM's proposed approaches for E. Coli and IBC TMDL development.

- Administer the 7 existing contracts to ensure contracted work is complete and TMDLs are established for 15 water segments

By: 12/31/03

Percent Complete  
80%

**Status:**

There has been a slight delay on a few of the seven contracts. OWQ has held back submission to ensure these TMDLs are complete and accurate. Trail Creek was submitted and approved. Salt Creek was submitted, Lake Michigan is in draft.

Conduct a minimum of 15 TMDLs for 2004. IDEM will provide a specific list of water segments to have TMDLs developed in 2004 and 2005

By: 1/31/04

**Percent Complete**

35%

**Status:**

OWQ has reviewed the 303(d) list and are making scheduling changes to accomplish TMDLs on E coli impaired waters on a watershed basis. A draft list of TMDLs to be developed by end of calendar year 2005 was submitted to EPA. Data Collection for TMDLs due in 2004 is nearly complete.

- Reevaluate and revise the current TMDL strategy to identify and incorporate the most effective and efficient approaches to developing TMDLs.

The revised strategy will:

1. Develop streamlined protocol for E.coli TMDLs.

- Partner with America's Clean Water Foundation to utilize load duration curve analysis to identify possible sources of E. coli loads and establish E. coli load reduction strategies for E. coli impaired watersheds

- Use load duration curve analysis information to complete TMDLs for 30-40 E. Coli impaired watersheds

By: 8/31/03

**Percent Complete**

65%

**Status:**

OWQ has worked through the St Joseph River TMDL and submitted a draft for EPA review. This TMDL utilized load duration curve analysis and guidance from the ACWF and, with some fine-tuning, will be the template used for E Coli TMDLs to be completed by OWQ staff. A draft E Coli template is under internal review.

2. Develop protocol for impaired biotic community TMDLs.

- Work with US Fish and Wildlife (USF&W) to develop a streamlined process to better define impaired areas and identify the sources of impairments in the defined areas

- Pilot the US Fish and Wildlife process and use the information collected to complete TMDLs for 3–5 impaired biotic community watersheds

By: 12/31/03

**Percent Complete**

15%

Status:  
OWQ is in the initial stages of development with USF&W to complete this pilot. OWQ is considering utilizing analysis developed in house as another approach for accomplishing IBC TMDLs. Positive feedback has been on the in-house approach. IDEM will collect data in the summer of 2004 to apply and further test this approach.

### 3. Develop outreach protocol for TMDL development

By: 12/31/03

Percent Complete  
45%

Status:  
OWQ is evaluating the current outreach protocol to determine where improvements are necessary. Rough drafts of an SOP are under internal review. Announcements have been revised to be more public friendly.

### 4. Complete pilot watershed TMDL.

By: 5/31/04

Percent Complete  
45%

Status:  
OWQ has begun developing a strategy to complete a watershed TMDL for the St. Mary's River watershed. OWQ has identified additional sampling needs for this watershed - samples collection began in March 2004.

### 5. Develop protocol for watershed TMDLs.

By: 8/31/04

Percent Complete  
15%

Status:  
OWQ will use lessons learned in completing the pilot watershed TMDL to develop a protocol for subsequent watershed TMDLs. OWQ has begun drafting pieces of a template to be used for watershed TMDLs. Work on the St. Mary's has begun. Staff met with critical local partners.

- To realize prioritization of 319 grant funding towards implementation of the TMDL revised strategy IDEM will work to establish several watershed specialist positions.

By: 12/31/03

Percent Complete  
100%

Status:  
IDEM has sought and received approval to create new watershed specialist positions within IDEM. IDEM has hired 4 candidates scheduled to begin in August 2004

These positions will:

1. Assist local watershed groups, soil and water conservation district (SWCD) boards, and local and regional governments in developing and implementing watershed plans for controlling non- point source pollution.

2. Liaison with the TMDL program and local entities.
3. Identify and fulfill training needs for local watershed coordinators and watershed groups.
4. Coordinate with IDNR/Purdue University conservation program specialists, NRCS, SWCDs, IDEM's TMDL program and watershed management program staff, and other agency staff as needed.
5. Work with local watershed groups to establish the environmental goals for their watershed(s) and establish a timetable to achieve these goals including a date these actions will be taken.
6. Coordinate with outside contacts to recognize and support an integrated watershed management approach.
  - a) Establish watershed planning and TMDL implementation coordination efforts that provide:
    - An information specialist to provide education and outreach for watershed planning and protection and TMDL implementation.
    - Several watershed specialists to accomplish coalition building and coordination among all interested and affected parties working to improve and protect watersheds throughout the state.

By: 12/31/03

Percent Complete

100%

Status:

In addition to the watershed positions noted above, OWQ has obtained EPA approval of its 319 grant proposal to fund an information specialist through the Indiana Association of Soil and Water Conservation Districts. OWQ has developed a contract with the Association for these services and qualified candidate was hired.

- b) With assistance of watershed specialists, develop master contact list for all OWQ TMDL and CWA grant programs to use to establish external coordination links

By: 6/30/04

Percent Complete

0%

Status:

This will begin when watershed specialist positions are filled.

- c) Develop coalition protocol for OWQ's TMDL and watershed planning and implementation programs to effectively utilize external coordination links

By: 3/31/04

Percent Complete

35%

Status:

OWQ staff have been identifying appropriate partners for watershed work coordination. Initial contact has been made with IDNR, NRCS, IASWCD, etc. The watershed specialist positions are a key element in this protocol.

- d) Utilize coalition protocol to share, verify, and validate existing qualitative and quantitative information related to impairments and impairment reductions

By: 6/30/04

Percent Complete

0%

Status:

This will begin when protocol is established.

- e) Utilize coalition protocol to help prioritize future impairment reduction efforts

By: 6/30/05

Percent Complete

0%

Status:

This will begin when protocol is established.

#### 2.13.2.2.

PPG (Y/N): Y

#### Target Runoff and Sewer Overflows Through Wet Weather Programs

EPA Role: Region 5 will make a preliminary identification of such LTCPs by 12/31/03 using the following criteria to help identify these priorities:

- Proximity to high-priority beaches as defined by EPA or the State.
- A Long Term Control Plan extending beyond the life of the current permit.
- Complex treatment systems with known problems related to wet weather.
- A location in a priority area as identified by either the Region or the State (sources for such determination will likely include 305 (b) reports and 303(d) lists).
- Existing compliance problems.
- Proximity to 1453 area.
- Potential for use of a battery of compliance assistance tools.
- Satellite communities (tributary to larger systems) that have SSO problems.

Facilitation of water quality improvements through the implementation of the Federal Phase II storm water program as well as review and approval of 106 Combined Sewer Overflow Long Term Control Plans.

1. Implementation of Phase II Storm water program

- a) Seek and receive EPA approval of Indiana's Phase II stormwater rules

EPA Role: EPA will review and approve

By: 7/31/03 Seek Approval

Percent Complete

100%

Status:

EPA granted approval (EPA email documented approval on 10/20/03.)

- b) EPA Guidance for MS4 permit compliance, enforcement, as well as interaction between MS4 and TMDLs.

By: 10/31/03



Percent Complete  
80%

Status:

This guidance has been drafted, external workgroup input has been obtained, and as communities have fulfilled requirements of the rule, the document has been used. It is currently posted on the IDEM website. Some revision is likely.

- c) Produce and Implement outreach and technical assistance plan for Phase II municipal entities, construction, and industry, Rule 13 under 104(b) 3 grant.

By: 9/30/04

Percent Complete  
40%

Status:

Outreach has been conducted as requested. A formal outreach plan has been completed as it is dependent on contracts not yet completed.

- d) Stormwater, Phase II Oracle Stormwater Compliance Database development and implementation.

By: 9/30/04

Percent Complete  
25%

Status:

Contract for a Storm Water database has been completed and staff is working with the contractor to develop the database.

- e) Review and approval of rule 13 Notices of Intent submitted

By: 4/30/04 providing sufficient resources

Percent Complete  
100%

Status:

All NOIs have been reviewed and received notices of sufficiency

- f) Obtain contractor(s) to assist IDEM with review of Rule 13 receivables, and input of data into the Rules 5 and 6 databases and GroupWise Document Management System (DMS).

By: 1/31/04

Percent Complete  
100%

Status:

Contractor has been selected and is assisting in the review of Part B submissions under Rule 13. Next steps include contractor assistance in the review of Part C submissions, input of data into Rules 5 and 6 databases

- g) Review and approval of baseline water quality characterizations submitted by communities

By: October, 2004 - Ongoing

Percent Complete  
50%

Status:  
Characterizations submitted in May and June, 2004. Staff and contractor have been reviewing Part B submissions as submitted..

- h) Review and approval of updates on program implementation requirements submitted by communities

By: 4/30/05 – ongoing

Percent Complete  
0%

Status:  
No implementation updates submitted - implementation plan due Nov. 2004.

- i) Review and approval of Rule 5 NOIs for 1-5 acre construction sites. IDEM, under the MOU will have DNR review plans.

By: Within 1 month of agency receipt.

Percent Complete  
Ongoing as NOIs are submitted

Status:  
New NOIs are being reviewed and approved as they are submitted. A greater percentage of permittees are receiving deficiency notices due to their lack of familiarity with new Rule 5 requirements.

- j) Coordinate with Rule 13 entities as they develop rule 5 equivalent programs

By: October 2004

Percent Complete  
0%

Status:  
Rule 13 entities have until 11/04 to have a program for construction site runoff control implemented. Rule 5 will be statewide until approval of these local MS4 (Rule 13) programs are approved (expected by 01/05). Some Rule 13 permittees may apply for their own Rule 5 programs before 1/05, but no requests have yet been received.

- k) Develop a strategy for the Reissuance of existing Phase I Rule 6 permits.

By: 12/31/03

Percent Complete  
95%

Status:  
A Strategy was developed that notification letters would be sent to permittees. A letter was sent to 1,665 entities notifying them that a permit renewal was necessary. Letters were sent to 385 rule 6 permittees with a currently valid permit indicating they did not need to submit a new application at this time. 48 transfer stations will be notified that they will need coverage under Rule 6.

- l) Review of Initial Submissions of Conditional No-Exposure Exclusions certifications submitted by industries after the effective date of revisions to Rule 6

By: 12/31/04

Percent Complete  
10%

## Status:

No-Exposure Exclusions continue to be submitted to IDEM. Approximately 30% of the facilities have been visited to verify qualification for no-exposure exclusions. Not all submitters will be visited, only those where there may be a question regarding eligibility. .

- m) Work through the Compliance / Enforcement Team to develop a stormwater phase II enforcement strategy.

By: 9/30/04

Percent Complete  
75%

## Status:

Permits and Compliance branch staff have formulated an enforcement referral approach that is consistent with the ERP for phase II MS4 communities. This approach is now being implemented. Notification letters for Rule 13, Part A have been sent to entities. Deficiency letters for Rule 13, Part B submittals have been sent to entities. For Rule 6, a notification letter template has been developed. Violation letter templates have been developed as well. A strategy has been formulated for follow-up/inspection of MS4 communities that have requested waivers from the rule as well as for Rule 6 No Exposure Exclusions. The next step is to develop targets for compliance inspections for Rule 13.

## 2. Combined Sewer Overflow Long Term Control Plans

- a) Ensure remaining CSO communities without requirement under NDPEs permit for submission of LTCP have an enforceable mechanism requiring submission of LTCPs.

By: 1/1/04

Percent Complete  
97%

## Status:

Angola, Gary, and Brazil need an enforceable requirement. A Gary CSO- Only permit has been public noticed and includes a due date of 10/1/04. Gary submitted a variance request as part of its comments. Angola's CSO-Only permit has been public noticed, and will be folded into the Angola NPDES permit, which has been drafted and will be issued in August, 2004. Office of Enforcement is preparing an Agreed Order for Brazil. .

- b) Create Schedule for action on all submitted long-term control plans.

Complete initial review of all plans received  
by 4/1/03, before 7/1/04

Complete initial review of all plans received  
by 4/1/04, by 7/1/05

Percent Complete  
30%

## Status:

Completeness reviews conducted on all submitted LTCPs. 20 LTCPs currently under comprehensive review. Schedules for initiation and completion of reviews have been completed.

- c) Use Performance Partnership Agreement funds to obtain contractor assistance for the review of models in LTCPs as well as provide overtime for staff review of LTCPs,

By: 1/31/04

## Percent Complete

15%

## Status:

Completeness reviews conducted on all submitted LTCPs. 20 LTCPs currently under comprehensive review. Schedules for initiation and completion of reviews have been completed

- d) Identify and coordinate LTCP reviews of all federal 'priority' CSO LTCPs with USEPA Region V and USEPA provide technical assistance.

By: 9/1/03

## Percent Complete

100%

## Status:

USEPA Region 5 has identified several communities for review of LTCPs. IDEM has held several conversations about the coordination of reviews.

**2.13.2.3.****Focus Water Quality Monitoring Efforts**

PPG (Y/N): Y

EPA Role: The Region will host periodic conference calls with the State on PCS modernization.

Scarce state (and federal) resources for water quality assessment and monitoring and the incredible task to thoroughly characterize Indiana's rivers, streams and lakes dictate that we focus our efforts to foster the most improvement in water quality possible. OWQ's Assessment branch will work with others to evaluate essential programs such as:

1. Monitoring and assessment of our waters.
2. Identification of causes and sources of impairments.
3. Application of appropriate strategies to restore impaired waters.
4. Assessing the effectiveness of the restoration strategies in resolving the problems.

The current monitoring strategy incorporates a five-year rotating basin approach and includes a probabilistic sampling scheme that allows us to make a statistically valid assessment of all of our rivers and streams at least once every five years. The probabilistic scheme, however, provides for only minimal assessment of individual waters (30-40 sites per basin) which limits our ability to identify individual waters within a basin that may have impairments. Minimal resources are currently being allocated to the identification of sources and causes (important for identifying and applying appropriate restoration strategies) and almost no resources are allocated to follow up studies to evaluate the effectiveness of the restoration strategies in resolving the identified water quality problem. (This will become more important as we continue to develop and implement TMDLs and other restoration strategies). These activities should serve as the basis for directing resources in other areas of the office (National Pollutant Discharge Elimination System (NPDES),

319 funds, SRF, and others). All possible ways to get support for these efforts (obtaining additional resources, EPA assistance, use of local assessment efforts etc.) will be explored.

EPA has identified improved water quality monitoring and assessment as a national priority and one which should be a major focus of states and tribes in the next few years. IDEM's Office of Water Quality (OWQ) has developed a Surface Water Quality Monitoring Strategy that contains the necessary elements to provide the information for essential OWQ programs and the public. This strategy has been recognized nationally by EPA as a "model" strategy and contains monitoring programs that provide for an overall assessment of our waters, identification of the sources and causes of water quality impairments, and assessment of the effectiveness of control strategies utilized to resolve these problems. Our challenge is to find adequate resources to implement as much of the strategy as practical.

1. IDEM will focus on ways to more fully implement the monitoring strategy and integrate it into our watershed activities by:

- a) Evaluating and implementing ways to obtain and/or realign available OWQ resources to help fill any remaining information needs

By: 12/31/03

Percent Complete  
90%

Status:

Internal reviews complete. Meetings with other program area to identify additional monitoring needs are ongoing...

- b) Reviewing and prioritizing the elements of the Monitoring Strategy to assure that the Strategy is focused on providing the information necessary to carry out essential OWQ programs with available resources

By: 3/31/04

Percent Complete  
90%

Status:

Internal reviews complete. Meetings with other program area to identify additional monitoring needs are ongoing..

- c) Exploring ways to work cooperatively with other agencies (federal, state, and local) to supplement OWQ activities by:

- Developing inventory of potential resources
- Contacting potential resources to determine cooperative status
- Developing plans to incorporate cooperative activities into monitoring strategy

By: 6/30/04

Percent Complete  
90%

## Status:

Currently are working cooperatively with several other agencies to help supplement OWQ activities. U.S. Army Corps of Engineers on Grand Calumet River sampling and TMDLS; ORSANCO on Ohio River and Indiana Ohio River tributary sampling and assessment; USGS on nutrient and other chemical sampling; a few cities on water quality sampling; IDNR on lakes and fish tissue sampling.

2. IDEM will work with EPA to assure that Indiana's Surface Water Quality Monitoring Strategy is consistent with the Final "Elements of a State Water Monitoring and Assessment Program" as best as practical:

a) IDEM will review their Surface Water Quality Monitoring Strategy to determine consistency with the new EPA guidance

By: 12/31/03

## Percent Complete

50%

## Status:

EPA draft report on October 2003 meetings discussing Indiana Surface Water Quality Monitoring Strategy was received in December, 2003. Discussions with EPA will be held in July-August 2004 to further discuss/develop changes to Strategy..

b) IDEM will coordinate with EPA to develop a schedule to make IDEM's Monitoring Strategy consistent with the new EPA Guidance

By: 6/30/04

## Percent Complete

0%

## Status:

Discussions on strategy were held with EPA in October, but no schedule has been developed as yet. Further discussion based on draft EPA report will occur in July/August 2004. Schedule to be developed based on these discussions

c) IDEM will revise Monitoring Strategy.

EPA Role: Work with IDEM to strengthen and complete strategy. Review strategy pieces as requests. Attend meetings/calls as requested (and as resources allow).

By 9/30/04

## Percent Complete

40%

## Status:

Possible revisions were discussed with EPA at October meeting. Draft EPA report received in December 2003. Further discussion with EPA in July-August 2004 to work on changes/additions to Strategy.

3. Collect and compile information necessary for the submission of the 2004 Consolidated List Report (formerly the 305(b) and 303(d) reports)

By: 3/31/04

## Percent Complete

100%

Status:  
Draft Consolidated List was published in October 1, 2003 Indiana Register.  
Comment period ended December 31, 2003.

- a) IDEM will provide a draft 2004 consolidated list for public comment.

By: 8/1/03

Percent Complete  
100%

Status:  
Draft Consolidated List was published in October 1, 2003 Indiana Register.  
Comment period ended December 31, 2003

- b) IDEM will provide a final 2004 consolidated list to EPA for approval.

By: 4/1/04

Percent Complete  
100%

Status:  
Draft Consolidated List was published in October 1, 2003 Indiana Register. Comment period ends December 31, 2003. Response to comments has been completed and Consolidated list was submitted to EPA on 4/1/2004.

- c) Provide water quality data from Assessment Information Management System (AIMS) to US EPA upon request.

By 12/1/04

Percent Complete  
50%

Status:  
Ongoing. Have responded and provided information to all current EPA requests.

- d) As resources allow, work with US EPA on developing a mechanism for transferring data from AIMS to STORET via SIM V2.0 or other program.

EPA Role: Provide assistance in getting STORET 2.0 linked to AIMS. Provide training in Region on STORET 2.0 and related modules.

By: 12/1/04

Percent Complete  
15%

Status:  
A conversion database has been acquired and is being tested. It will then need to be modified for Indiana's use.

- d) IDEM will explore funding sources and other potential partners for submitting data to STORET.

By: 6/30/04

Percent Complete  
20%

Status:  
IDEM is investigating various funding sources for this activity.

4. Participate with US EPA in jointly reviewing the State's bioassessment program against the national guidance on what constitutes an adequate bioassessment program and identifying areas that need additional attention.

EPA Role: Actively work with EPA Headquarters (HQ) to finalize and provide the national guidance, and will jointly review Indiana's program with IDEM. Seek additional funds, assistance and tools from HQ to assist the State in improving its bioassessment program.

Ongoing

Percent Complete  
20%

Status:  
Waiting on EPA national guidance to be finalized. Meetings with EPA and its contractors to discuss these issues are scheduled in March 2004.

5. Work with ORSANCO and other partners to evaluate methods used for large river biological assessments. Work with ORSANCO, Region 5 and other partners to assess the condition of large rivers within the Region.

Ongoing

Percent Complete  
Ongoing

Status:  
Staff have participated in conference calls with ORSANCO and reviewed proposals for this project.

EPA Role: Coordinate efforts with IDEM, ORSANCO and other states and partners to evaluate methods used for large river bioassessments within the Mississippi watershed using 104(b)(3) funds. Utilizing the information gained from the 104(b)(3) projects, an assessment of the condition of large rivers will be conducted with ORD's REMAP funding, with fieldwork beginning in FY'04.

6. Continue to work towards the development of the biocriteria program.

Ongoing

Percent Complete  
Ongoing

Status:  
Staff are continuing to work with EPA and their contractors on this program.

EPA Role: Provide technical assistance and program support for the development of the biocriteria program. Continue to work with the Midwest Biodiversity Institute and coordinate efforts with the states to promote and assist with the development of bioassessment and biocriteria programs. Hold at least one meeting in FY '04.

7. Implement activities outlined in the final nutrient criteria development plan which will lead to a nutrient criteria rulemaking by 2006 and adoption of nutrient standards by 2007. Provide EPA with annual updates on progress implementing the plan.

By: Updates provided annually.

Percent Complete  
50%



Status:

Sampling ongoing. Two years of the four years of sampling have been completed.

EPA Role: Provide funding for State projects supporting nutrient criteria development up to amount provided by HQ. Facilitate nutrient RTAG. Review State's annual updates.

#### 2.13.2.4. Increase Efforts to Maintain Safe Drinking Water

PPG (Y/N): Y

EPA Role:

Effectively develop and implement the Safe Drinking Water and Source Water Protection approaches. Track, assist and assess State to ensure:

- A) drinking water quality data is collected and reported
- B) knowledge about the ground water resource is advanced
- C) health benefits for citizens are maximized through resource and source water protection barriers, and treatment installation when necessary.

#### 2.13.2.5. Maintain Drinking Water Program

PPG (Y/N): Y

EPA Role:

The Region 5 Ground Water and Drinking Water Branch(GWDWB) will ensure the accuracy and completeness of SDWIS/FED data submissions and provide technical assistance and guidance on data management issues as resources allow. In addition, the Region will keep IDEM up-to-date on new/revised reporting requirements.

- a) Maintain a data management system that tracks requirements for all rules. Convert all Drinking Water Branch Access Databases to Safe Drinking Water Information System (SDWIS) Database

By: end of FY2005

Percent Complete  
Ongoing

Status:

All Drinking Water Branch (DWB) Access Databases will be converted to SDWIS by December 2004. Any new rules that will be implemented will utilized the Chemical Decision Support (CDS) module of SDWIS for tracking requirements of the new rules.

- Maintain inventory, total coliform rule and enforcement modules in SDWIS

Daily

Percent Complete  
Ongoing

**Status:**

The DWB utilizes the inventory, TCR and enforcement modules of SDWIS daily. These modules are the database of records for DWB. Maintenance is done daily by DWB staff. The DWB is slowly utilizing the CDS module. Currently, the nitrate/nitrite rule, inorganic chemical (IOC) rule, radionuclide rule, TTHM and most of lead and copper rule are now part of SDWIS..

- Maintain Access Database for all other rule requirements.

**Daily**

Percent Complete  
Ongoing

**Status:**

The Compliance Section (CS) of the DWB continue to track the following rule in Microsoft Access format: VOC, SOC, Lead and Copper, SWTR, IESWTR, Stage 1 DBPR, standardized monitoring framework (SMF), waivers, CCR, and Rads. These Access databases are maintained daily by the CS staff..

- Convert nitrate/nitrite rule, radionuclide rule, inorganic chemical rule, surface water treatment rule, total trihalomethane rule, interim enhanced surface water treatment rule, stage 1 disinfection byproducts rule and the consumer confidence rule databases to SDWIS

**By: 9/30/03**

Percent Complete  
50%

**Status:**

The nitrate/nitrite, IOCs rads, TTHM Access Databases have been converted to SDWIS. The rest of the databases will be converted to SDWIS by end of the year.

- Convert volatile organic compound rule, synthetic organic compound rule, lead and copper rule and the waiver program databases to SDWIS

**By: 9/30/04**

Percent Complete  
25%

**Status:**

The VOC and SOC databases will be converted to SDWIS by August 30, 2004. Part of the lead and copper and waiver databases have been converted but the rest will be converted to SDWIS by September 30, 2004.

- b) Migrate SDWIS/State required information to SDWIS/Fed quarterly such as inventory, violation and enforcement information.

- Submit or migrate inventory information, maximum contaminant level (MCL) violations, action level (AL) and treatment technique (TT) violations, monitoring and reporting (M/R) violations, enforcement actions and public notification (PN) information from SDWIS/State to SDWIS/Fed

**Quarterly**

Percent Complete  
Ongoing quarterly

## Status:

Since the DWB utilized the inventory and enforcement business system modules of SDWIS as the database of record, migration from SDWIS/State to SDWIS/Fed is done quarterly on schedule

c) Determine violations for all rules and maintain an adequate compliance assistance program.

- Monthly, quarterly and annual MCL, AL, TT, M/R and PN violations are identified by the databases and violation notices are issued

Monthly, quarterly and annual

## Percent Complete

25% -ongoing

## Status:

Access databases queries, TCR noncompliance determination reports and CDS reports are created daily, monthly, quarterly or annually as the case maybe to identify MCL, AL, TT, M/R, and PN violations. These queries and reports are used to issue the appropriate enforcement actions and/or compliance assistance by the CS, Field Inspection Section (FIS) and the Office of Enforcement (OE).

- Quarterly violations of the operator certification, construction permitting, capacity development. and wellhead program are issued

Quarterly

## Percent Complete

Ongoing quarterly.

## Status:

During the first quarter, three violation letters were issued for construction without a permit to the systems, two violation letters were issued to the driller or contractor for construction without a permit, two violation letters were issued for operator issued, and two violation letters were issued for construction not in conformance with a construction permit. During the second quarter two violation letters were issued for construction without a permit to the system, two violation letters were issued to the driller or contractor for construction without a permit, and two violation letters were issued for operator issues. No new violations on capacity development. During the third quarter three violation letter was issued for construction not in conformance with a permit.

- Compliance assistance is provided by technical staff to affected PWS before and after violation notices are issued

Ongoing

## Percent Complete

Ongoing

## Status:

Based upon the Access violation queries and violation reports from SDWIS, the CS and the FIS pursue the appropriate measures in assisting the noncompliant systems to return to compliance. Often times, CS staff contacts the affected systems to provide the needed technical assistance or have the FIS staff visit the system for further onsite technical assistance needs. Contractor from RCAP working with systems that have been determined to be "at Risk". The contractor contacts system and provides the necessary assistance to help return them to compliance. Contract has been completed with RCAP in the third quarter.

- Staff work to resolve major violations immediately through compliance assistance efforts
- MCL violations will be responded to by field staff within 1 day of receipt for acute contaminants and within 5 working days for chronic contaminant MCLs.

## Ongoing

Percent Complete  
Ongoing

## Status:

Field staff respond to MCL violations within 1 day for acute contaminants and 5 working days for chronic contaminants.

- d) Provide an adequate laboratory certification program

EPA Role: The Region 5 GWDWB will support the State laboratory certification program by assessing the ISDH laboratory and its laboratory certification program every three years to document that the State is successfully implementing the current federal regulations.

- IDEM provides this program in cooperation with Indiana State Department of Health (Indiana State Department of Health (ISDH)). IDEM will continue to pursue with Indiana State Department of Health (ISDH) a memorandum of understanding (MOU) of issuing laboratory certification to drinking water laboratories
- Provide EPA Region 5 with a list of the Indiana's certified laboratories –

## By: 7/04 and 7/05

Percent Complete  
100%

## Status:

The latest Certified Laboratory list compiled by ISDH in June 2004 was forwarded to EPA R5 in July 2004.

- e) Keep adequate records of information and State decisions

- All incoming and outgoing records are stored numerically by PWS identification number in boxes for microfilming

## Ongoing

Percent Complete  
Ongoing

## Status:

All incoming and outgoing records are stored by ID # and by date in boxes for microfilming. Further, all outgoing compliance records are also stored in our shared drive. Information is filed in hard copy in central file room for sanitary surveys, inspections, wellhead protection, general correspondence, and construction permits.

- All generated compliance letters are stored electronically as an e-file in the Branch Server

Ongoing

Percent Complete

Ongoing

Status:

All compliance records are stored electronically as an e-file in the Branch server.

f) **Maintain Operator Certification Program**

EPA Role: Region 5 GWDWB will inform IDEM of the annual operator certification reporting requirements as required under the 1996 Safe Drinking Water Act (SDWA) amendments. Region 5 will work closely with the State to assure reports are submitted on time and that they meet Federal requirements. Region 5 will inform IDEM of national and regional guidance and related activities. Region 5 will review the annual report as well as the Operator Certification Expense Reimbursement Grant (ERG) Report.

- Apply for the Education Reimbursement Grant for training of all new certified operators of system 3,300 or less.

By: before 9/30/03

Percent Complete

100%

Status:

Education Reimbursement Grant application was submitted on 7/21/03 and revised on 8/27/03. The grant agreement was sent to IDEM from EPA on 9/16/03. Total amount of grant is 1.9 million dollars.

- Use training funds to hire new staff or a contractor to perform training -

By: 7/31/04

Percent Complete

55%

Status:

Working on RFP for a contractor or contractors to train the certified operators for system with population of 3,300 or less. The RFP is about ready to be posted for bids. RFP was received from three different vendors and a choice was made. Contract will soon be forth coming

- Train an estimated 100 grandparented operators per month once staff/contractor is in place

- Continue to work with trade associations on Operator's educational training

Ongoing

Percent Complete

75%

Status:

No training of grandparent operators has taken place at this time. However we are continuing to work with trade associations on the Operator's educational training.

- Work with Association of Boards of Certification to provide examinations for the operator certification tests

## Ongoing

Percent Complete

66% - Ongoing

Status:

Exam was held in November 2003. Working with ABC to lengthen test time from three hours to five and half hours. The longer time would be used for more complicated questions for the more complicated certification. Next exam is scheduled for May 2004. Next exam to take place on November 4, 2004.

## g) Perform Sanitary Surveys and provide technical assistance at public water systems

- Complete sanitary surveys at community and non transient, non community systems - at least once every 5 years or every 3 years if required by the SDWA

- Perform follow up inspections at transient non community systems identified as part of the screening surveys conducted along with source water assessment field data collection - as resources allow, follow ups will be made when the inspector is in the area performing inspections at community and non transient non community systems

## h) Drinking Water Construction Permits

- All permits issued on time - reported monthly

## reported monthly

Percent Complete

100%

Status:

All permits were on time - none were late.

- For new system, ensure that they have met new system capacity development requirements

## Ongoing

Percent Complete

100%

Status:

Two Water System Management Plans were received by IDEM. One system was granted a Certification of Demonstration of Capacity, and one system connected to another system after a meeting with IDEM.

## i) Source Water Protection Efforts

EPA Role: Region 5 GWDWB will support assessment and protection programs by State and local agencies by: a) developing partnerships with other U.S. EPA programs and other Federal agencies to assist States with assessments and protection; b) developing assessment and protection tools for use by States and locals; and c) by using outreach to get other parties to support source water protection.

- Complete all Wellhead Plan reviews and make final determinations -

## By: 7/31/04

Percent Complete

65%

## Status:

At the end of this quarter a total of 626 WHPP Phase I plans had been submitted. All plans that have been submitted have been preliminarily reviewed. Of the 626 Phase I plans, 463 wellhead area delineations have been approved, and 306 Phase I plans (which includes the wellhead delineation) had been reviewed and approved..

## - Complete all Source Water Assessments

By: 5/31/05

## Percent Complete

40% - ongoing

## Status:

By this quarter end, the USGS has processed field data for approximately 2400 source water assessments collected by the field data contractors. The USGS will use the collected field data to prepare approximately 3,000 surface water and ground water source water assessments for public water systems.

Two field data contractors, have collected field data for approximately 2400 transient non-community public water systems.

Field data collection activities are about 90% complete and are in progress in approximately 75 Indiana counties with an expected completion date by September, 2004.

The USGS was contracted to process the field data into a GIS format and integrate this information into a source water database. This source water database would identify potential sources of contamination to public water systems. SWAPs would then be generated by the USGS with this information.

At this time, the USGS has depleted contractual monies available for this project and they have informed IDEM they will not be able to complete the contract. IDEM is assessing options available to complete the work. .

j) Complete Annual Resource Deployment Plan (ARDP). The plan specifies both IDEM's and EPA's activities relating to carrying out the specific requirements of the SDWA. The ARDP also notes those activities that IDEM may not be able to complete without increased resources.

## - Submit completed ARDP to EPA-

By: January 1 each year

## Percent Complete

50%

## Status:

The 2003 ARDP was submitted to EPA R5

k) Upgrade the Drinking Water Watch Web site. The following modification/additions to the Drinking Water Watch website will be made in order to better serve and meet the requests of the public.

Additional Search Capabilities for:

- \* Type of water system
- \* Type of samples and results

Display of Additional Types of Data on:

- \* Monitoring schedules
- \* Summarized field sample results
- \* Lead and Copper summaries

Modification of Existing Pages to:

- \* Support links to new searches
- \* Support links to new data

By: 7/1/04

Percent Complete  
0%

Status:

The supplemental EnPPA grant to accomplish this task was not awarded by EPA on time to be able to execute the contract on time. IDEM will try to get another supplemental grant during the next fiscal year to accomplish this task.

#### I) Data Management

EPA Role: Region 5 GWDWB will ensure the accuracy and completeness of SDWIS/FED data submissions and provide technical assistance and guidance on data management issues as resources allow. In addition, Region 5 will keep the State up-to-date on new/revised reporting requirements or changes.

Hire a contractor to enhance the performance of SDWIS by doing the following tasks that are not being developed for SDWIS by EPA:

- \* Migration of old (legacy) data from current database into SDWIS such that analytical results from inception of all public water systems to present time transferred into SDWIS with correct associations to each particular water system and its facilities;
- \* Migration of monitoring frequencies/schedules from current database into SDWIS such that accurate sampling schedules/monitoring frequencies of all public water systems transferred into SDWIS with correct associations to each particular water system and its facilities;
- \* Provide training and technical assistance to the technical staff (with using all of the functions of SDWIS/State) on the following:
  - a) Technical assistance will be used to ultimately perform compliance determination for all public water systems in the state
  - b) Training will be conducted on all applicable areas of SDWIS, depending on the state and/or federal rule(s) and the individual compliance officer(s)

By: 10/1/04

Percent Complete  
0%

Status:

The supplemental EnPPA grant to accomplish this task was not awarded by EPA on time to be able to execute the contract on time. IDEM will try to get another supplemental grant during the next fiscal year to accomplish this task.

#### **2.13.2.6. Implement New Requirements**

PPG (Y/N): Y



EPA Role: See below.

- a) Improve the ability of PWSs to meet the requirements of the SDWA by improving implementation of the Capacity Development Rules and Strategy

EPA Role: Region 5 GWDWB will inform IDEM of the annual Capacity Development reporting requirements as required under the 1996 SDWA amendments. Region 5 will work closely with the State to assure reports are submitted on time and that they meet Federal requirements. Region 5 will inform IDEM of national and regional guidance and related activities.

- Identify public water system in need of technical, financial, and managerial capabilities

Ongoing

Percent Complete  
75%

Status:  
Continuing to identify public water supplies that are in need of technical, financial and managerial capabilities

- Work with a contractor, RCAP, to provide direct assistance to at least 50 systems

Report quarterly

Percent Complete  
100%

Status:  
Contract with RCAP was implemented on June 20, 2003. A circuit rider was given systems that were designated by the Drinking Water Branch to be in serious need of capacity building. Twenty-three systems were given to the circuit rider. The circuit rider discovered that the majority of the problems with these systems were managerial and financial. In second quarter, the circuit rider has achieved compliance with five of these systems. The circuit rider is still working to achieve compliance with fifteen of the twenty-three systems. The three remaining systems were removed from the circuit rider's list and given to the field staff because they were in need of technical assistance. During the third quarter the circuit rider has achieved compliance with eleven systems. The contract has been completed with RCAP however three new staff members have been added to work with system to meet capacity

- Finalize the handbook for new systems

By: 12/31/03

Percent Complete  
100%

Status:  
The handbook containing guidelines for the Water System Management Plan is completed, and DWB has received the printed handbooks for distribution.

- b) Vulnerability assessments and emergency response planning

- Provide assistance to community systems serving over 3,300 population in meeting federal requirements - report number of systems assisted quarterly

## Report quarterly

Percent Complete  
75%

## Status:

The final quarter of a contract with RCAP assisted four system with population over 3,300 return to compliance. Three new staff have been hired in the Capacity Development Section to continue working with assisting systems with capacity/compliance problems. We are identifying and assisting public water system that will not be in compliance with the upcoming Arsenic Rule.

- Provide assistance to community systems serving less than 3,300 population and non community systems - report number of systems assisted quarterly

## Report quarterly

Percent Complete  
75%

## Status:

A contract with RCAP contract assisted 21 system with population under 3,300 to return to compliance. Three new staff have been hired in the Capacity Development Section to continue working with assisting systems with capacity/compliance problems. We are identifying and assisting public water system that will not be in compliance with the upcoming Arsenic Rule.

## c) Promulgate new rules

EPA Role: U.S. EPA headquarters will continue to develop regulations and guidance to implement the 1996 amendments to the SDWA. The Region 5 GWDWB will assure that input from the State is requested and that IDEM's comments/issues are raised and presented to the national regulation development workgroups for discussion to help assure that regulations and guidance are appropriate and workable.

Region 5 GWDWB will review and comment on proposed State legislation and regulations to ensure consistency with Federal statutory requirements.

Region 5 GWDWB will provide training for IDEM staff on all new drinking water regulations within six months of final rule promulgation.

Promulgate 3 new (federal) drinking water rules (radionuclide rule, arsenic rule and long term 1 enhanced surface water treatment rule) in a timely manner including 2 year time extension period. Complete promulgation of the Drinking Water System Operational Rule

- Submit to the Water Pollution Control Board (WPCB) the re-codification of the federal radionuclide, arsenic and long term 1 enhanced surface water treatment rules into State rules for preliminary adoption.

By: 9/30/03

Percent Complete  
25%

## Status:

Cadmus is under contract with EPA to assist the State in rule promulgation. A "First Notice" publication in the Indiana Register was made on February 1, 2004. The second notice is anticipated to be published by September 1, 2004.

- Submit to the WPCB for final adoption of the radionuclide, arsenic and long term 1 enhanced surface water treatment rules.

By: 3/31/04

Percent Complete

0%

Status:

It is anticipated that all 3 rules will go to the WPCB for preliminary adoption by the WPCB in Spring of 2004 and final adoption by late summer 2004.

- Submit to EPA Region 5 Primacy Application package for the radionuclide, arsenic and long term 1 enhanced surface water treatment rules.

By: 8/31/04

Percent Complete

0%

Status:

Primacy Application package will not be submitted to EPA until Dec. 2004.

- Submit to the WPCB for final adoption the Drinking Water System Operational Rule.

Notify all public water systems of the 3 new federal and 1 new State regulatory requirements.

By: 1/31/04

Percent Complete

90%

Status:

The Operational Rule is currently not the highest priority. Resources have been redirected toward improving construction permitting requirements at small systems.

- d) Notify all public water systems of the 3 new federal and 1 new State regulatory requirements

- Provide copies of the new regulatory requirements for the radionuclide, arsenic, long term 1 enhanced surface water treatment rules, and Drinking Water System Operational Rule to the affected PWS.

By: 9/30/04

Percent Complete

50%

Status:

Copies of the federal rules on rads, arsenic and LT1 has been made available to affected public water systems. When the State rules for those rules become effective late 2004, the systems will provide copies and rules presentation training or seminars will be provided through water works associations. The Operational Rule is not final to supply to affected PWS, but the latest version of the rule is located on our website. PWSs will be notified of the 3 new federal regulatory requirements consistent with the schedule established under the "Primacy Extension Agreement".

- Assists EPA in providing federal fact sheets of the radionuclide, arsenic and long term 1 enhanced surface water treatment rules and other information such as guidance to the affected PWS.

By: 12/31/03

Percent Complete

100%

Status:

PWSs was provided with the federal "Fact Sheets" of the 3 new federal rule and guidance (if available) consistent with the schedule established under the "Primacy Extension Agreement". The same information is available through EPA website with link to IDEM website.

#### **2.13.2.7. Expand Resources of Existing Program**

PPG (Y/N): Y

EPA Role: See below.

- a) Provide adequate funding to carry out all functions of the PWSS program

EPA Role: Region 5 GWDWB will support IDEM's efforts to expand State program resources in order to ensure drinking water safety.

Region 5 GWDWB will work with IDEM to prioritize actions with new and existing resources that have the greatest likelihood of increasing the compliance rates (may not be enforcement actions, but could be efforts to educate or other compliance assistance) and work with IDEM on targeting of some of their new resources at a specific problem(s).

- IDEM will work with the State Budget Agency on the continued use of DWSRF Set-Aside money for program implementation until fees can provide program support (after July 2005) - ongoing and submit work plan yearly

Ongoing and submit work plan yearly after July, 2005.

Percent Complete

100%

Status:

IDEM has reached agreement with the State Budget Agency on the use of set-asides until fees can fund the program. All necessary workplans have been prepared. IDEM will start collecting fees in July 2004 established under the fee program.

- IDEM will begin collection of fees enacted by the Legislature starting in July 2004. The fees phase in years 2004 and 2005. Full annual fees will be collected beginning January 2006 - ongoing after July 2004

Starting July, 2004 and ongoing.

Percent Complete

10%

## Status:

The fee billings for 2004 will be mailed to all PWSs by IDEM's Office of Management and Budget (OMBA) in August 1, 2004. DWB is preparing the needed information for proper billing. The billing information will be provided to OMBA in early July 2004.

- Continue to use SEE personnel to assist with program implementation

## Ongoing

## Percent Complete

50%

## Status:

The DWB currently has 3.5 SEE FTEs. NAPCA and IDEM continue to advertise and promote the hiring of SEE employees. The DWB anticipate to hire about 6.5 SEE FTE during the FY.

- Pursue additional staffing resources for the program

## Ongoing

## Percent Complete

95%

## Status:

IDEM has a Phase 1 staffing package to add staff to the Drinking Water Program. 10 of the 12 new positions in the staffing package for the Branch have been filled. IDEM is preparing a second phase of staffing additions which will add additional resources to the program

- b) Improve PWS monitoring and reporting violations with focus on small systems

EPA Role: The Region 5 GWDWB continues to accept drinking water enforcement referrals from the IDEM Office of Enforcement. The Region continues to issue enforcement actions to public water systems with drinking water violations.

Region 5 GWDWB will work with IDEM to identify the root causes of non-compliance with the different types of systems and work together to find solutions

- Continue the implementation of the Small System Laboratory Assistance Program with Indiana State Department of Health (ISDH) in doing the analyses of total coliform and nitrate samples for PWS serving population 100 or less.

## Ongoing

## Percent Complete

100% - Ongoing

## Status:

The agreement with ISDH for FY 2004 was signed in Sept. 2003. Sampling bottles for use during 2004 were mailed in Dec. 2003 (for monthly systems) and will be mailed by Feb. 2004 (for quarterly and seasonal systems.)

- Refer all non compliant systems to enforcement

## Ongoing

## Percent Complete

50% - Ongoing

## Status:

All noncompliant systems are routinely referred to the Office of Enforcement (OE). OE has created an NOV and AO monitoring and reporting violation templates for small systems to expedite the process of returning the system back to compliance.

- c) Apply for the Expense Reimbursement Grant for training of all new certified operators of system 3,300 or less before 9/30/03.

Use training funds to hire new staff or a contractor to perform training.

By: 7/31/04

## Percent Complete

100%

## Status:

Education Reimbursement Grant application was submitted on 7/21/03 and revised on 8/27/03. The grant agreement was sent to IDEM from EPA on 9/16/03. Total amount of grant is 1.9 million dollars. No new staff was hired at this time using training funds from this grant. A contractor has been selected and will be paid from this grant.

**2.13.2.8.**

PPG (Y/N): Y

**Ensuring an Effective Point-Source National Pollutant Discharge Elimination System (NPDES) Program**

EPA Role: Coordinate development of region-wide Compliance Streamlining Plan.

OWQ will continue to issue new, renewal, and modification of permits within statutory deadlines. OWQ will also continue to significantly reduce the number of administratively extended NPDES permits. In addition, the OWQ will implement agency wide initiatives concerning compliance program activities such as the inspection protocol, adherence to the Enforcement Referral Process, and implementation of a system for tracking and following up on Agreed Orders/Consent Decrees.

1. Enhancing Permitting Programs

- a) Work with U.S. EPA to develop list of priority industrial/municipal National Pollutant Discharge Elimination System (NPDES) renewal applications.

1) Create schedule for processing priority applications.

2) Develop a permit issuance schedule for major and minor facilities for the next two fiscal years.

By: 7/1/03 and ongoing

## Percent Complete

75%

## Status:

IDEM has evaluated and prioritized major and minor industrial and municipal permits and discussed with EPA Region V. IDEM is implementing a plan for addressing the highest priority administratively extended major permits. Next step is to establish schedules for issuance of the other major and minor permits by the end of 2005.

- b) Use Performance Partnership Grant Funds to pay overtime for work on priority NPDES Permit work.

By: 1/31/04

Percent Complete  
100%

Status:

\$50,886 has been made available for overtime pay for issuance of priority NPDES permits. As of 7/13/04 approximately \$30,000. remained. Overtime was recently renewed for priority issuance through December 2004.

Fill out EPA Region 5's self-assessment questionnaire.

By: 2/1/04

Percent Complete  
100%

Status:

IDEM completed the assessment and sent it to EPA 2/04. IDEM is currently reviewing EPA's comments on the assessment and have conducted teleconferences to discuss IDEM additions.

2. Issue New and Modified Permits on Time

a) National Pollutant Discharge Elimination System (NPDES) Permits

Ongoing

Percent Complete  
100%

Status:

IDEM continues to issue new permits on time.

b) Wastewater Construction Permits

Ongoing

Percent Complete  
100%

Status:

IDEM continues to issue construction permits on time.

3. Work with Indiana State Department of Health (ISDH) and U.S. EPA to develop by policy and rule, if appropriate, procedures for review of community-based alternative wastewater treatment systems.

Finalize approach

By: 9/30/03

Implement approach

By: 12/31/04

Percent Complete  
80%

Status:

IDEM has met with ISDH. IDEM has drafted an operational permit, has developed monitoring requirements and is tailoring the permit for two applications for permits. IDEM is also issuing construction permits for these systems.

4. Evaluate lower priority National Pollutant Discharge Elimination System (NPDES) renewals for opportunities to streamline renewals, establish general permits or permits by rule. Develop plan for lower priority National Pollutant Discharge Elimination System (NPDES) permits and begin to implement by 10/1/03.

By: 10/1/03 (and ongoing)

Percent Complete  
70%

Status:  
IDEM has evaluated and prioritized major and minor industrial and municipal permits and discussed with EPA Region V. IDEM is implementing a plan for addressing the major permits and next steps include scheduling other permits

5. Implementation of Agency-Wide Inspection Protocols

- a) Revise National Pollutant Discharge Elimination System (NPDES) Wastewater Inspection COP and document management procedures to incorporate Agency Inspection Protocol and Enforcement Referral Policies, and update existing state forms and inspection checklists as necessary. Provide training in use of these procedures/forms to wastewater inspectors and compliance staff statewide. Implement revised COP and refine process as necessary.

By: Initial training by 7/1/03, Ongoing training at monthly staff meetings

Percent Complete  
100%

Status:  
OWQ Wastewater Inspections COP and revised state NPDES Facility Verification of Inspection forms completed in March 2003. Initial comprehensive classroom training provided to central office and regional office wastewater inspectors prior to 7/1/03. Ongoing training routinely provided thru e-mail distribution and at monthly inspections section staff meetings by Inspections Section Chief.

- b) Complete Violation Letter format for Inspectors and Compliance Staff using Agency-Wide Protocols and develop/implement internal tracking system for minor violation follow-up and referrals to the Office of Enforcement.

By: Initial training - 7/1/03  
Ongoing training at monthly staff meetings

Percent Complete  
100%

Status:  
Violation letter format completed. Development of an internal tracking system for minor violation follow-up and referrals to OE has been completed and is currently being utilized. Monthly status reports are provided to staff and branch managers for follow-up

- c) Implementation of Agreed Order Follow-up Policy, and incorporate into NPDES Wastewater Inspections COP.

By: 7/1/03 and Ongoing

Percent Complete  
100%



## Status:

Policy dated 9-8-03 finalized by OE and distributed to compliance managers for formal implementation on an ongoing basis. Have worked with OLC to develop informal Federal Consent Decree follow-up procedure

- d) Revise all Inspector and Compliance Staff position descriptions to reflect adherence to revised agency-wide policies and protocols

By 9/30/03

## Percent Complete

100% for Inspections Section; 0% for Compliance Evaluation Section

## Status:

All central office-based inspector and compliance staff position descriptions and performance criteria revised. Copies have been provided to regional offices for use with their wastewater inspectors.

- e) Assist in the Completion and Implementation of Agency-Wide Sampling Protocol Lead by Office of Criminal Investigation (OCI). Utilize available funding to procure necessary sampling equipment and supplies in order to implement sampling protocol.

By: Per Agency Schedule, no later than June 2005

## Percent Complete

75%complete

## Status:

OCI's suggested revisions to the OWQ COP currently under review. Met with Assessment Branch to finalize equipment and supplies list; requisitions submitted for equipment/supplies prior to procurement deadlines; and items beginning to arrive in 7/04.

- f) Assist with "sector" projects and other initiatives developed by the C/E Team.

By: 1/1/03 and ongoing

## Percent Complete

100% Ongoing

## Status:

Ongoing. All requested tasks assigned by C/E Team completed to date. Compliance managers have provided all input requested by C/E Team.

- g) Improve system for handling water compliance information.

5. Initiate and examine opportunities for increasing coordination between Data Management and Facilities Compliance.

By: 9/30/03, Ongoing

## Percent Complete

40%

## Status:

Data and Information Services Section formally assigned to Compliance Branch effective 10/13/03. All staff position descriptions and performance criteria have been updated. Continue to raise the need for add'l. agency resources to support central filer room to make availability of monthly monitoring reports more accessible to compliance staff and the public. Working to fill new vacancy within Section due to promotion of existing staff; reconfiguring Data Section workspace; staff training in use of new scanner and forms development.

6. Develop plan for achieving close to real time access to DMR information.

By: 4/30/04

## Percent Complete

60%

## Status:

This is tied to #5 above.

7. Examine opportunities and constraints for expanding use of available PCS fields.

By: 4/30/04

## Percent Complete

70%

## Status:

Tied to #5 above. State defined PCS fields expanded to identify inspection findings in relation to compliance status at the time of inspection. Project on hold due to OWQ's assistance to EPA in development/testing of new federal PCS by EPA and possible development of a state version of PCS..

8. Reevaluate priorities for Operator Assistance program under 104g grants. Implement criteria for determining which communities to assist.

By: September 2003 and Ongoing (subject to continued federal funding)

## Percent Complete

75%

## Status:

104g workplan/grant based on Federal fiscal year. Staff determined which facilities to carryover to FY '04 for continued assistance and how new facilities will be selected. Will be spending time in field to assist in development of statistically valid compliance rates for CSO communities..

9. Develop reporting template for Operator Assistance (Coordinate with Drinking Water Branch on infrastructure security issues).

By: 1/31/04

## Percent Complete

100%

**Status:**

OWQ has not received any adverse comments from EPA regarding current reporting template used for the on-site technical assistance program for FY 2002, '03 and mid-year '04. Since wastewater security funding was new in FY '03, the '03 mid-year and final annual report was the first time OWQ has needed to prepare a progress report addressing wastewater infrastructure security. Wastewater to coordinate with DWB if any refinements to infrastructure security portion of report requested by EPA or required in FY '04 workplan. To date, no internal input requested for infrastructure security mid-year report.

10. Target priority wastewater facilities and personnel for compliance activities.

EPA Role: The Region will work with the State to develop an efficient and effective enforcement strategy, and to the extent necessary, coordinate with HQ to gain support for options in that strategy which may vary from the traditional coverage inspection requirements.

Target priority wastewater facilities and personnel for compliance activities and implement resulting work plan. Work with Office of Enforcement and U.S.EPA to assign priorities to facilities for inspection and ensure that staff resources are focused on facilities with greatest contribution (or potential to contribute) to water quality problems. Participate in Region V National Pollutant Discharge Elimination System (NPDES) Compliance 'Streamlining'.

By: October 2003, Ongoing

**Percent Complete**

95% on workplan & implementation; 100% on 'Streamlining'

**Status:**

Workplan for FY '04 includes increased emphasis on laboratory proficiency. Semi-publics to be included in Mayflower program in 2004. Minor industrial facilities to include in EPA's DMR QA/QC Program in '04.

Also increased focus on certified operators who have let their certifications lapse but still continue to sign off as the operator in responsible charge of permitted facilities.

EPA to provide field training to new OWQ staff on conducting pretreatment audits and Pretreatment Compliance Inspections. Pretreatment compliance staff will be working with EPA staff to select PCIs to be conducted beginning in FY '05.

OWQ wastewater compliance and enforcement have participated in EPA led conference calls. OWQ has also provided comments on draft EPA documents when requested. Awaiting announcement of next steps from EPA

- a) IDEM will develop and implement a plan to inspect 70% of its majors, 30% of its minors and conduct pretreatment audits on 20% of pretreatment programs annually.

Annually

**Percent Complete**

On schedule

**Status:**

This is a transition year as wastewater field staff previously focused on completing their inspections on a federal FY cycle instead of July - June. This has now been clarified to staff with updated position descriptions and PCS generated lists of permitted industrial and municipal major and minor facilities within their assigned geographical areas.

In 8/02, pretreatment group went from 3 to 2 full-time staff. 3rd staff was reassigned to assist with the operator certification program. In 3/03, the pretreatment group went from 2 FT staff to 1 with staff resignation. Branch resources reallocated in 5/03 to address and prioritize pending permitting and compliance-related needs of the pretreatment program. Two FT staff focused on permits; 2 original pretreatment staff focused on providing permits and compliance training; then focusing on training for compliance staff and completion of annual audits. Senior pretreatment program coordinator has retired and is no longer with IDEM. Pretreatment compliance staff has completed 9/45 (20%) pretreatment audits FY '04 EnPPA cycle.

- b) IDEM will provide EPA Region 5 with a list of facilities targeted for wastewater inspections.

By: 1/1/04 and 1/1/05

Percent Complete  
100% for FY '04.

Status:  
Statewide list has been submitted to EPA. No comments received from EPA.

- c) IDEM will work with Region 5 on Headquarter's special initiatives such as developing statistically valid noncompliance rate project for CSO communities by conducting inspections and completing the project checklist for approximately 25 facilities.

By: 6/30/04

Percent Complete  
50%

Status:  
OWQ sent 2 staff to CSO/SSO Inspections training in Chicago Nov. 12-14, 2003. Submitted pre-proposal to EPA for potential funding on Jan. 30, 2004. Funding approved; inspections to be completed by 12/31/04.

- d) Citizen complaints received by IDEM or EPA concerning facilities for which EPA has initiated enforcement, will be referred to EPA.

EPA Role: Citizen complaints received by EPA will be referred to IDEM for follow-up.

- e) For complaints concerning sludge and pretreatment matters, IDEM should report back the disposition of the complaint to USEPA upon conclusion of the investigation.

By October 2003, Ongoing

Percent Complete  
5%

Status:  
Contact person for OWQ is Rick Roudebush. Still working on establishing a Region 5 POC.

11. Continue to coordinate with EPA to identify and implement improvements to existing pretreatment program, including preparation and timely issuance of industrial pretreatment permits, oversight/audits of delegated local programs, and explore opportunities to pursue pretreatment program delegation from EPA.

EPA Role: EPA will review several POTW annual reports to evaluate the state program.

- a) IDEM will review Annual Reports for POTWs with approved Pretreatment programs.

Ongoing

- b) Review the Pretreatment Audit and Pretreatment Compliance Inspection checklists (with Region 5 assistance) to identify opportunities to streamline them.

By: 6/30/04

Percent Complete  
25%

Status:  
Current focus in on pretreatment audits and associated checklists. Have received PCI inspection manuals from EPA for preliminary review. Need field training from Reg. 5 on how to conduct a PCI.

- c) Incorporate recommendations from Region 5 on the IDEM Annual Report format.

By 6/30/04

Percent Complete  
5%

Status:  
Need to followup with EPA regarding any EPA recommendations.

- d) IDEM will conduct audits and/or PCI inspections at 50% of the pretreatment facilities.

By: 6/30/05

Percent Complete  
25% - Ongoing

Status:  
Pretreatment compliance staff will be working with EPA staff to select PCIs to be conducted during FY '05. IDEM has requested field training from EPA in conducting PCIs

- e) Industrial users will be inspected twice each five years with ongoing review of semi-annual periodic reports. IDEM will develop an inspection schedule for IUs located in non-approved pretreatment cities.

EPA Role: EPA will conduct 10 inspections of IUs in non-approved pretreatment cities.

By: October 2003, Ongoing

Percent Complete  
10%

Status:  
EPA to share procedures manuals and provide training to OWQ staff new to the pretreatment program on conducting pretreatment audits and industrial user inspections. Pretreatment compliance staff will be working with EPA staff to prioritize industrial user inspections in FY '05. Compliance managers will be working with staff to develop IU inspection schedule and means for tracking.

- f) IDEM will compile an inspection plan for the waste water treatment facilities that will include a list of facilities that we will be inspecting.

By: 2/1/04

Percent Complete  
100%Status:  
This action item the same as 10.b

12. Continue to implement the wastewater operator certification and continuing education programs and identify/implement improvements to the existing programs and procedures. Work with internal and external stakeholders in developing improved customer service to operators, including outreach to the public on program requirements and access to certification and training course information.

By: October 2003 (and ongoing)

Percent Complete  
100%Status:  
State application forms, exam study guides, certification manual, web site and Operator Examiner newsletter have been updated and are current. All State form revisions have now been approved. Quarterly meetings scheduled with trade association reps. to discuss program issues, needs, and feedback.

13. Work with U.S. EPA on National Pollutant Discharge Elimination System (NPDES) Compliance Streamlining Project. Develop implementation plan based on results of project.

By: 12/31/03 (and ongoing)

Percent Complete  
100% to-dateStatus:  
All tasks requested of OWQ Compliance and OE Water Section staff completed.

14. Will develop a list of permits that will be prioritized.

By: 1/1/04

Percent Complete  
100%Status:  
IDEM has developed a list of high priority permits and will transmit to EPA.

15. Will provide to EPA a list of prioritized permits for their review.

By 2/1/04

Percent Complete  
0%Status:  
IDEM has developed a list of high priority permits and has transmitted them to EPA.

16. As resources allow, will participate on the Region 5 Mercury Permitting and PMP workgroup.

Ongoing

Percent Complete  
12.5% - ongoing

Status:  
IDEM has participated in conference calls.

17. Complete the Program Integrity Self Assessment form.

EPA Role: EPA will participate in the national Program Integrity Workgroup along with the designated Region 5 states.

By: 2/1/04

Percent Complete  
0%

Status:  
Self Assessment form was completed and sent to EPA. EPA sent comments to IDEM. IDEM has prepared responses to those comments and sent them to EPA.

**2.13.2.9.**

**Protect Wetlands**

PPG (Y/N): Y

Approximately 85% of the state's original wetlands have been lost in the pursuit of other priorities (agriculture, development, etc.), and the Department (and the state) has set a goal of no net loss of wetlands.

Depending on the outcome of legislation in this year's General Assembly, OWQ will work with DNR and others through rulemaking or implementation of new (or existing) laws, to provide the highest level of protection possible of Indiana's remaining wetland resources. IDEM will also participate in federal discussions about future interpretations of the federal Clean Water Act. As needed, IDEM will also work with the general public and the legislature on future legislation to ensure appropriate protection of the wetland resources. IDEM is committed to the protection of the state's remaining wetland.

IDEM will work with the Governor's Wetland Task Force established in June 2003 to help craft legislation relating to isolated wetlands for 2004 and set state policy for wetlands.

- a) Develop and utilize a wetland regulatory tracking database.
- b) Develop a work plan for the database development contractor

By: 7/31/03

Percent Complete  
45%

Status:  
OWQ has established a workplan with IDEM IT staff to develop this database - IT has made this project a priority. Testing of developed portions is ongoing.

- c) Have contractor implement database development work plan

By: 12/30/03

Percent Complete  
35%

Status:  
IDEM IT is implementing the workplan.

- d) Based on available resources, populate database with historical data

By: 9/30/04

Percent Complete  
0%Status:  
This will begin when the database development is complete.

e) Pending completion of the wetland regulatory tracking database and based on available resources, develop wetland compliance and enforcement strategy.

- Utilize populated wetland regulatory tracking database to identify sites that require compliance and enforcement actions

By: 12/31/04

Percent Complete  
20%Status:  
OWQ has begun coordination with IDEM's OLC and OE to determine how to proceed on compliance and enforcement issues. Templates for necessary info are being developed.

- Develop standard operating procedure for prioritizing and implementing compliance and enforcement actions

By: 6/30/04

Percent Complete  
20%Status:  
OWQ has begun coordination with IDEM's OLC and OE to determine how to proceed on compliance and enforcement issues. Templates for necessary info are being developed.

f) Develop Floristic Quality Index (FQI) to characterize Indiana wetlands.

- Explore contractor options for developing the Indiana FQI

By: 12/30/03

Percent Complete  
100%Status:  
OWQ has a contract in place.

- Develop work plan for developing the Indiana FQI

By: 6/30/04

Percent Complete  
100%Status:  
OWQ has a contract in place that includes tasks (a workplan) to develop an FQI.

- Implement work plan to develop the Indiana FQI



By: 6/30/05

Percent Complete  
70%Status:  
Contact has been executed the work plan has started.**2.13.2.10.**

PPG (Y/N): Y

**Use Good Science and Sound Policy to Shape and Implement Water Quality Standards**

IDEM is committed to utilizing sound science and policy to develop water quality criteria and the use of sound policy to fairly develop and implement Water Quality Standards.

Indiana was one of the first states to fully implement the recommended Federal water quality criteria for toxics (EPA Water Quality Criteria Documents 1980-1986) and the recommended bacteriological criteria (E. coli) in the revisions to its standards promulgated in 1990. It was also the first state to adopt the Great Lakes Water Quality Guidance into its own state standards in 1997.

1. IDEM has committed to a “workgroup” approach to developing proposed water quality standards and implementation procedures to ensure sound policy and science is used to make needed revisions as expeditiously as practical. A triennial review of the state’s water quality standards should be mostly completed within the next biennium.

a) IDEM has put together a group of statewide stakeholders to regularly meet during the Triennial review rulemaking and provide recommendations to IDEM on the process and main policy issues (ongoing).

b) Statewide stakeholders have begun to meet on at least a quarterly and on an as needed basis

Starting August, 2002 through at least June 2004

Percent Complete  
ongoingStatus:  
The stakeholder steering committee continues to assist the individual workgroups as draft rule language is prepared. Minimally, publication of second notice drafts is expected for all four workgroups by late 2004..

c) Based on discussion by the stakeholders, IDEM will draft a public participation strategy

By: 7/1/03

Percent Complete  
100%Status:  
Public participation strategy was presented to the steering committee June 25, 2003.

d) Public participation plan finalized.

By: 9/30/03

Percent Complete  
100%

Status:

The steering committee agreed that each workgroup should identify the right place and time for public discussions relative to their issues and that IDEM needs to work with the Water Pollution Control Board to gauge their interest in public discussions on triennial review related issues.

2. IDEM will work with external stakeholders to develop policy on specific Triennial rulemaking issues. Discussion in these workgroups will, to the highest degree practical, include analysis of background information and the most current research and information.

Percent Complete  
Ongoing

Status:

Regularly scheduled workgroup meetings are ongoing.

3. IDEM will establish external workgroups and specific work plans to provide recommendations on specific Triennial rulemaking issues to include

a) E.coli

First Notice by 6/1/03

Second notice by 12/1/03

Preliminary adoption by 6/1/04

Final adoption by 12/31/04

Percent Complete  
30%

Status:

Second notice was delayed as a result of requests by the regulated community to hold off moving forward with a second notice so that wet weather and CSO related issues can be discussed regarding the e.coli standard. IDEM is separately working with stakeholders to identify options for discussion on these issues. IDEM staff is drafting rule language that focuses on the non-wet weather issues for review.

b) Mercury

First notice by 6/1/03

Second notice by 12/1/03

Preliminary adoption by 6/1/04

Final adoption by 12/31/04

Percent Complete  
40%

Status:

Draft rule language and agency response to first notice comments were prepared in advance of second notice published June 1, 2004

c) Antidegradation/OSRW

First notice by 3/1/03  
 Second notice by 12/1/03  
 Preliminary adoption by 7/31/04  
 Final adoption by 1/31/05

Percent Complete  
 20%

Status:  
 Draft rule language and agency response to first notice comments have been prepared and are under review in advance of second notice for.

4. Rule changes that based on best science, updates of existing rule language, and technical corrections and clarifications that have a reasonable potential of minimal controversy.

First notice by 6/1/03  
 Second notice by 11/1/03  
 Preliminary adoption by 5/31/04  
 Final adoption by 8/31/04

Percent Complete  
 55%

Status:  
 Draft rule language and agency response to second notice comments were prepared in advance of third notice.

5. Other Triennial Issues.  
 IDEM will sort out what issues remain and initiate rulemaking(s) as appropriate.

- a) Workgroup will be established

By: 12/31/03

Percent Complete  
 25%

Status:  
 After discussion at the steering committee meeting on September 24, 2003, it was decided that the agency should put together an outline of non-fast track issues.

- b) Workplan for rulemaking will be developed

By: 3/31/04

Percent Complete  
 10%

Status:  
 The fast track workgroup met on Feb 10, 2004 -non Fast Track issues will be addressed for them when Fast Track rule is finalized

- c) First Notice(s) will be developed

By: 6/1/04

Percent Complete  
0%  
Status:  
Dependent on b) above.

d) Second Notice(s) will be developed

By: 1/1/05

Percent Complete  
0%  
Status:  
Dependent on b) above.

e) Preliminary adoption

By: June 2005

Percent Complete  
0%  
Status:  
Dependent on b) above.

6. IDEM will pursue a federal grant to provide technical assistance to the external stakeholders in conjunction with IDEM technical staff.

a) If the grant is awarded, IDEM will:

Develop contract by August, 2003; Issue contract by November 2003

Percent Complete  
20%  
Status:  
After discussion at the steering committee meeting on September 24, 2003, it was decided that the agency would gather ideas for the use of the grant from the stakeholders before the next meeting on January 7, 2004. IDEM is currently putting together a Request for Proposals.

7. IDEM will reach out to the academic community in Indiana in order to leverage in-state technical expertise.

8. IDEM will develop contact list and general invitation letters to academic communities

By: June 2003

Percent Complete  
100%  
Status:  
Contained in the public participation plan presented to the steering committee on June 25, 2003.

9. IDEM will send out letters and follow up with interested parties

By: 8/1/03

Percent Complete

0%

Status:

10. IDEM will collaborate with EPA staff on these rulemakings in order to maximize the exchange of technical information and ideas as well as to get their input on rulemaking related issues.

11. IDEM will coordinate with EPA on participants in workgroups

By: 7/1/03

Percent Complete

100%

Status:

Members of EPA were contacted and have been attending various triennial review meeting either in person or by teleconference.

12. IDEM will consult with EPA on specific rulemakings on second notice and preliminary adoption

#### **2.13.2.11.**

PPG (Y/N): Y

#### **Work with the Public and Other Governmental Authorities to Address Water Quality Problems.**

To work proactively to discover, coordinate, and focus available resources within and outside of the IDEM to addressing water quality problem areas. Explore additional federal funding opportunities, identify local efforts and interest and investigate non-profit and university efforts aimed at improvements in water quality. Try and integrate these opportunities into priority water quality improvement efforts.

A variety of financial resources exist in the state of Indiana for addressing water quality issues. These resources have been used by different agencies with a variety of mandates and individual focuses, providing some beneficial effect on their own. Focused coordination of those resources to priority water quality problems will help to leverage funds for effective water quality improvements.

1. Implement the strategy defined in goal number 1 – Progress on Restoring Impaired Waterways – to better utilize data and create internal and external coordination links

By: 6/30/05

Percent Complete

40%

Status:

OWQ staff have been identifying appropriate partners for watershed work coordination. Initial contact has been made with IDNR, NRCS, IASWCD, etc. Internal discussions continue on strategy development. Implementation will begin when strategy development is complete.

2. Determine what other agencies and entities are doing to protect and improve water quality in Indiana.

- a) Develop a protocol to systematically identify external water protection and improvement efforts being done by other agencies and entities

By: 12/31/03

Percent Complete

15%

Status:

Initial internal discussions have begun on strategy development.

- b) Implement the protocol to systematically identify external water protection and improvement efforts being done by other agencies and entities

By: 3/31/04

Percent Complete

0%

Status:

Implementation will begin when strategy development is complete.

3. Explore options to effectively share identified external water protection and improvement efforts being done by other agencies and entities.

- a) Identify possible IDEM media and communication tools that may be used to reach appropriate interested parties

By: 6/30/04

Percent Complete

10%

Status:

Initial contact has been made with agency media and communication staff some process revisions have been identified and implemented.

- b) Solicit ideas for effective information sharing techniques from other agencies and entities

By: 9/30/04

Percent Complete

10%

Status:

Initial contact has been made with some agencies and entities some process revisions have been identified and implemented based on public input.

4. Share with other agencies and entities information on water protection and improvement efforts being done by IDEM other agencies and entities to identify resource-leveraging opportunities.

- a) From information sharing options identified, develop protocol to utilize most effective options

By: 12/30/04

Percent Complete

0%

Status:  
Will begin when information gathering is complete.

b) Implement information-sharing protocol

By: 3/31/05

Percent Complete  
0%  
Status:  
Will begin when protocol development is complete.

c) Based on shared information work with other agencies and entities to identify resource-leveraging opportunities

By: 6/30/05

Percent Complete  
0%  
Status:  
Will begin when protocol development is complete.

5. As determined necessary for cross-program and/or cross-agency concerns, identify appropriate contacts and work to establish open communication and standard operation procedures and/or memorandums of understanding to ensure continued coordination.

a) Seek approval for a NRCS liaison position that will assist IDEM's Watershed Branch Chief by coordinating the duties of the watershed specialist positions

By: 4/30/04

Percent Complete  
20%  
Status:  
This will begin when specialist positions are established. Contact with NRCS was made and a meeting was held to discuss details. Funding options are being explored

This position will:

- Develop training needs and a training plan for the watershed specialist positions

By: 12/31/04

Percent Complete  
20%  
Status:  
Initial information gathering on training needs was done in preparation for requesting specialist positions be created. Contact with NRCS has been made and a meeting date to discuss details is to be set.

- Maintain a common message and a common understanding of watershed planning, source identification, and other processes.

Ongoing

Percent Complete  
ongoing

Status:  
Internal discussions continue to coordinate and communicate common goals and objectives concerning watershed management.

- Review and comment on submitted watershed plans

Ongoing

Percent Complete  
Ongoing  
Status:  
Plans are reviewed as they are received.

- Gather materials for joint reports on the progress of local groups

Ongoing.

Percent Complete  
15% - ongoing  
Status:  
OWQ is establishing a network of contacts to assist local watershed management groups.

- b) Seek to establish a Watershed Advisory Council to meet on a quarterly basis and communicate regularly on water quality related issues

By: 12/31/03

Percent Complete  
1%  
Status:  
Some initial contacts have been made with groups to identify interest in participating on a watershed advisory council.

The Watershed Advisory Council could be comprised of representatives from:

- IDEM (Watershed Branch chief, Watershed Management Section chief, TMDL program leader, and Watershed Specialists),
- IDNR (Lake and River Enhancement Program chief)
- Purdue University (Conservation Program Specialists),
- Indiana Association of Soil and Water Conservation Districts (association director and contracted Watershed Information Specialist),
- NRCS (NRCS/IDEM Liaison and a representative of technology program staff),
- Farm Bureau, and
- The Nature Conservancy.

#### 2.13.2.12.

#### Focus Internal Resources to Address Most Significant Water Quality Issues

PPG (Y/N): Y



Conduct an initial review and then periodically review to ensure that all areas of the office are focused on highest, best use of staff time and resources to gain water quality improvements and most critical services to citizens.

1. Ensure that OWQ Priorities are directed, as best as practical, at activities that will serve the public efficiently and effectively and will make the biggest difference in terms of improving and protecting the water quality across the state.

2. Conduct a semi-annual review of OWQ activities to ensure that all work continues to be prioritized to provide efficient/effective services and is oriented toward making a significant difference in water quality improvement and protection. The review will include, at a minimum, a presentation by each branch chief on current activities and any planned changes to those activities to the OWQ senior management team. Adjustments as necessary will be made by the team.

By: 7/1/03 and biannually thereafter

Percent Complete  
25%

Status:

A semi-annual review was conducted on January 29, 2004 by the Deputy Commissioner of Environmental Results and the OWQ branch chiefs. Largely, the OWQ is on track with the EnPPA commitments. However, due to state legislation, a couple of issues were identified that should ultimately be revised in the EnPPA. These issues include the implementation of the state wetland regulatory permit program per HEA 1798, and regulation of small public water supplies. We anticipate these changes to the EnPPA to occur during the mid-term review on June 30, 2004.